



# **Botley West Solar Farm**

STATEMENT OF COMMON GROUND –

Vale of White Horse District Council

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**EN010147/APP/11.7/12**

12 November 2025

NPI-12426  
Statement of  
Common Ground -  
Vale of White  
Horse District  
Council  
Rev2  
12 11 2025

## Approval for issue

Jon Alsop

12 November 2025

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### Prepared for:

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**on behalf of SolarFive Ltd.**

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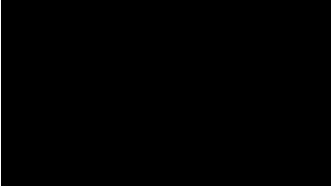
Appendix A Record of Relevant Correspondence

Appendix B VoWH District Council & Oxfordshire County Policy Compliance Tables

## SIGNATURES

This Statement of Common Ground has been prepared and agreed by SolarFive Ltd and Vale of White Horse District Council.

### Vale of White Horse District Council



Stuart Walker  
Major Applications Team Leader  
Vale of White Horse District Council  
12th November 2025

### SolarFive Ltd



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12th November 2025

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# 1 Introduction

## 1.1 DCO Reference

1.1.1 EN010147/APP/11.7/12

## 1.2 Date of Examination

1.2.1 May 2025 – November 2025

## 1.3 Statement Overview

1.3.1 This Statement of Common Ground ('SoCG') comprises a record of consultation held with the relevant SoCG organisation to date as appropriate, and is designed to evolve, representing the ongoing nature of these discussions throughout the Examination period.

1.3.2 This SoCG has been prepared between (1) the Applicant and (2) Vale of White Horse District Council (jointly referred to as the Parties).

1.3.3 An overarching Statement of Commonality **[EN01047/APP/11.6]** has been submitted alongside this document and should be referred to in conjunction with this SoCG.

1.3.4 The Examining Authority has requested that the SoCGs include the following matters as set out in the Rule 6 Letter **[PD-006]**:

- Methodology for environmental assessments;
- Data collection methods;
- Baseline data;
- Data/statistical analysis, approach to modelling and presentation of results;
- Expert judgements, assumptions and worst case scenario;
- Assessment of alternatives;
- Design development;
- Identification and sensitivity of relevant features and receptors;
- Construction and operational effects;
- Embedded and additional mitigation;
- Cumulative effects and mitigation; and
- Relevant wording in the draft Development Consent Order (dDCO)

1.3.5 For the avoidance of doubt, this SoCG comprises contributions from the following environmental topic disciplines:

- Ecology
- Historic Environment
- Agricultural Land Use & Public Rights of Way

- 
- Landscape and Visual Resources
  - Noise and Vibration
  - Planning Policy

1.3.6 This statement addresses the following areas of common ground in relation to the Applicant Project Team's engagement with Vale of White Horse District Council to date:

- a. Relevant submission documents and plans
- b. Record of relevant correspondence to date
- c. Matters that are agreed
- d. Matters that are not agreed

1.3.7 As referenced above, c, and d (sections 5), summarises issues that are 'agreed', or are 'not agreed'. 'Not agreed' indicates a final position where the parties have agreed to disagree. 'Agreed' indicates that an issue has been resolved.

## **1.4 Development Consent Order**

1.4.1 It is agreed that Vale of White Horse District Council will act as a relevant planning authority in relation to the discharging of the requirements of the DCO applicable to its administrative area and LPA boundary. Where the expertise of the Local Highway Authority and / or Local Lead Flood Authority is required then Oxfordshire County Council will either be the discharging authority or subject to consultation during the approval process.

## **1.5 Planning Policy Context**

1.5.1 It is agreed that the following energy national policy statements (NPS) are applicable to the proposed development:

- NPS EN-1 Overarching National Policy Statement for Energy;
- NPS EN-3 Renewable Energy Infrastructures; and
- NPS EN-5 Electricity Networks Infrastructure.

1.5.2 It is accepted by the parties that from the planning authority's perspective, assessment of the proposed development against these statements is solely a matter for the Examining Authority and no further assessment on the degree of compliance is made by them in this statement.

1.5.3 It is agreed that the development plan applicable to the development proposal comprises:

- Vale of White Horse Local Plan 2031, part 1 (LPP1), adopted December 2016.
- Vale of White Horse Local Plan 2031, part 2 (LPP2), adopted October 2019.
- Cumnor Neighbourhood Plan (CNP) 'made' 21 May 2021.

## 2 Relevant Submissions Documents and Plans

2.1.1 A list of DCO documents and plans of relevance to engagement with Vale of White Horse District Council is identified in the tables below for ease of reference.

**Table 2.1: Draft DCO submission documents and plans record pursuant to Vale of White Horse District Council discussions – Ecology and Nature Conservation**

Document/Plan Ref.	Title	Examination Library reference	Rev./Dated
EN010147/APP/2.2	Streets, Access and Rights of Way Plans	CR2-004	Rev2/September 2025
EN010147/APP/2.6	Statutory and Non-Statutory Sites - Features of Nature Conservation Plan	<a href="#">APP-009</a>	November 2024
EN010147/APP/2.8	Habitats of Protected Species Plan	<a href="#">APP-010</a>	November 2024
EN010147/APP/2.9	Statutory and Non-Statutory Features of Historic Environment Plan	<a href="#">APP-012</a>	November 2024
EN010147/APP/2.10	Hedgerow Removal Plans	AS-007	February 2025
EN010147/APP/3.1	Draft Development Consent Order	TBC	Rev9/November2025
EN010147/APP/6.2	ES Volume 0, Non-Technical Summary	<a href="#">APP-037</a>	P0/ November 2024
EN010147/APP/6.3	ES Volume 1, Chapter 9 Ecology and Nature Conservation	<a href="#">REP4-010</a>	Rev3/ August 2025
EN010147/APP/6.4	ES Volume 2, Figure 9.1 Statutory Designated Sites	<a href="#">APP-086</a>	November 2024
EN010147/APP/6.4	ES Volume 2, Figure 9.2 Non-Statutory Designated Sites	<a href="#">APP-087</a>	November 2024
EN010147/APP/6.4	ES Volume 2, Figure 9.3 a b & c Phase 1 Habitat Map	<a href="#">APP-088</a>	November 2024
EN010147/APP/6.5	ES Volume 3, Appendix 9.1 Desk Study	<a href="#">APP-150</a>	P0/ November 2024
EN010147/APP/6.5	ES Volume 3, Appendix 9.2 Phase 1 Habitat Survey Report	<a href="#">APP-151</a>	P0/ November 2024
EN010147/APP/6.5	ES Volume 3, Appendix 9.3 Hedgerow Survey Report	<a href="#">APP-152</a>	P0/ November 2024

Document/Plan Ref.	Title	Examination Library reference	Rev./Dated
EN010147/APP/6.5	ES Volume 3, Appendix 9.4 Bat Survey Report	<a href="#">REP5-039</a>	Rev1/September 2025
EN010147/APP/6.5	ES Volume 3, Appendix 9.5 Great Crested Newt (GCN) Survey Report	<a href="#">APP-154</a>	P0/ November 2024
EN010147/APP/6.5	ES Volume 3, Appendix 9.6 Invertebrate Survey Report	<a href="#">APP-155</a>	P0/ November 2024
EN010147/APP/6.5	ES Volume 3, Appendix 9.7 Reptile Survey Report	<a href="#">APP-156</a>	P0/ November 2024
EN010147/APP/6.5	ES Volume 3, Appendix 9.8 Badger Survey Report [CONFIDENTIAL]	<a href="#">APP-157</a>	P0/ November 2024
EN010147/APP/6.5	ES Volume 3, Appendix 9.9 Breeding Bird Survey Report	<a href="#">APP-158</a>	P0/ November 2024
EN010147/APP/6.5	ES Volume 3, Appendix 9.10 Wintering Bird Survey Report	<a href="#">APP-159</a>	P0/ November 2024
EN010147/APP/6.5	ES Volume 3, Appendix 9.11 Dormouse Survey Report	<a href="#">APP-160</a>	P0/ November 2024
EN010147/APP/6.5	ES Volume 3, Appendix 9.12 Arable Weeds Survey Report	<a href="#">APP-161</a>	P0/ November 2024
EN010147/APP/6.5	ES Volume 3, Appendix 9.13 Biodiversity Net Gain Assessment	<a href="#">REP6-020</a>	Rev2/October 2025
EN010147/APP/6.5	ES Volume 3, Appendix 9.14 Habitats Regulations Assessment Report	REP6-022	Rev1/October 2025
EN010147/APP/6.5	ES Volume 3, Appendix 9.15 Veterans Tree Survey Report	<a href="#">APP-164</a>	P0/ November 2024
EN010147/APP/6.5	ES Volume 3, Appendix 9.16 Section 42 Consultation Responses	<a href="#">APP-165</a>	P0/ November 2024
EN010147/APP/15.6	Bat Technical Note	REP6-044	Rev 1/October 2025
EN010147/APP/7.3.3	Landscape, Ecology and Amenities Plan	<a href="#">CR2-043</a>	Rev3/ September2025
EN010147/APP/7.6.1	Outline Code of Construction Practice – Part 1	<a href="#">REP6-028</a>	Rev 5/October 2025
EN010147/APP/7.6.1	Outline Code of Construction Practice – Part 2	<a href="#">REP6-030</a>	Rev 5/October 2025
EN010147/APP/7.6.2	Outline Operational Management Plan	<a href="#">REP6-032</a>	Rev 5/October 2025



Document/Plan Ref.	Title	Examination Library reference	Rev./Dated
EN010147/APP/7.6.3	Outline Landscape and Ecology Management Plan	REP6-034	Rev 6/October 2025
EN010147/APP/7.6.4	Outline Decommissioning Plan	REP6-036	Rev 2/October 2025

**Table 2.2: Draft DCO submission documents and plans record pursuant to Vale of White Horse District Council discussions – Historic Environment**

Document/Plan Ref.	Title	Examination Library reference	Rev./Dated
EN010147/APP/6.2	ES Non-Technical Summary	APP-037	November 2024
EN010147/APP/6.3	ES Volume 1, Chapter 7: Historic Environment	CR2-019	Rev 3/September 2025
EN010147/APP/6.5	ES Volume 3, Appendix 7.1: Historic environment desk-based assessment	APP-131	November 2024
EN010147/APP/6.5	ES Volume 3, Appendix 7.2: Assessment of airborne remote sensing and satellite imagery for archaeology	APP-132	November 2024
EN010147/APP/6.5	ES Volume 3, Appendix 7.3: Geophysical survey report, Parts 1-8	APP-133 – APP-140	November 2024
EN010147/APP/6.5	ES Volume 3, Appendix 7.4: Blenheim Palace World Heritage Site – Heritage Impact Assessment	CR2-036	Rev1/September 2025
EN010147/APP/6.5	ES Volume 3, Appendix 7.5: Settings Assessment	CR2-038	Rev 3/ September 2025
EN010147/APP/6.5	ES Figures 2.1a – 2.4c – Illustrative Masterplan	CR2-026	Rev 2/September2025
EN010147/APP/6.5	ES Figures 8.248 - 8.371 - Photomontages (Winter and Summer)	CR2-032	Rev2/September 2025
EN010147/APP/7.6.5	Outline Written Scheme of Investigation	CR2-053	Rev 3/September 2025
EN010147/APP/12.7	Additional Photomontages for Historic Environment Assessment	CR2-059	Rev 1/ September 2025
EN010147/APP/17.11	Archaeological Evaluation Report by Cotswold Archaeology – Parts 1 to 8	REP6-055 to REP6-062	October 2025

Document/Plan Ref.	Title	Examination Library reference	Rev./Dated
EN010147/APP/17.12	Archaeological Evaluation Report by Wessex Archaeology	REP6-063	October 2025

**Table 2.3: Draft DCO submission documents and plans record pursuant to Vale of White Horse District Council discussions – Agricultural Land Use and PRow**

Document/Plan Ref.	Title	Examination Library reference	Rev./Dated
EN010147/APP/6.2	ES Non-Technical Summary	APP-037	Rev0/November 2024
EN010147/APP/6.3	ES Chapter 17 - Agricultural Land Use and Public Rights of Way	APP-054	Rev0/November 2024
EN010147/APP/6.4	ES - Figures 17.1, 17.2 and 17.6	APP-108, APP-109 and APP-113	Rev0/November 2024
EN010147/APP/6.4	ES - Figures 17.3, 17.4 and 17.5	CR2-033, CR2-034, and CR2-035	Rev 1/September 2025
EN010147/APP/6.5	ES - Appendix 17.1 ALC and Soil Survey Report	APP-223	Rev0/November 2024
EN010147/APP/7.6.1	Outline Code of Construction Practice - Part 1 Annex B: Outline Public Rights of Way Management Strategy and Annex C Outline Soil Management Plan	REP6-028	Rev5/October 2025
EN010147/APP/7.6.2	Outline Operational Management Plan	REP6-032	Rev5/October 2025

**Table 2.4: Draft DCO submission documents and plans record pursuant to Vale of White Horse District Council discussions – Landscape and Visual Resources**

Document/Plan Ref.	Title	Examination Library reference	Rev./Dated
EN010147/APP/6.2	ES Non-Technical Summary	APP-037	Rev0/November 2024
EN010147/APP/6.3	6.3 - ES Chapter 8 – Landscape and Visual Impact Assessment	REP6-012	Rev4/October 2025

Document/Plan Ref.	Title	Examination Library reference	Rev./Dated
EN010147/APP/6.4	Figure 8.128 to 8.243: Representative Viewpoint Photographs (Summer)	CR2-032	Rev0/November 2024
EN010147/APP/6.4	Figure 8.12 to 8.127: Representative Viewpoint Photographs (Winter)	REP5-028	Rev1/September 2025
EN010147/APP/6.4	Figure 8.1-8.3 Site Location	APP-067	Rev0/November 2024
EN010147/APP/6.4	Figure 8.244: National Character Areas	APP-068	Rev0/November 2024
EN010147/APP/6.4	Figure 8.245: Regional Landscape Character	APP-069	Rev0/November 2024
EN010147/APP/6.4	Figure 8.246: Local Landscape Character Areas	APP-070	Rev0/November 2024
EN010147/APP/6.4	Figure 8.247: District Landscape Character Areas (including ZTV)	APP-071	Rev0/November 2024
EN010147/APP/6.4	Figure 8.248 to 8.371: Photomontages (Winter and Summer)	CR2-032	Rev2/September 2025
EN010147/APP/6.4	Figure 8.4-8.6: Landscape Resources Plan	APP-081	Rev0/November 2024
EN010147/APP/6.4	Figure 8.7: ZTV and Representative Viewpoints (Whole Project Overview)	APP-082	Rev0/November 2024
EN010147/APP/6.4	Figure 8.8: ZTV Section Overlaps (Whole Project Overview)	APP-083	Rev0/November 2024
EN010147/APP/6.4	Figure 8.8a: ZTV Bare Earth	APP-084	Rev0/November 2024
EN010147/APP/6.4	Figure 8.9-8.11: Representative Viewpoint and Photomontage Locations	APP-085	Rev0/November 2024
EN010147/APP/6.5	Appendix 8.1: Landscape Character	APP-143	Rev0/November 2024
EN010147/APP/6.5	Appendix 8.2: Landscape Value	APP-144	Rev0/November 2024
EN010147/APP/6.5	Appendix 8.3: Strategic Arboricultural Impact Assessment & Method Statement	APP-145 to APP148	Rev0/November 2024
EN010147/APP/6.5	Appendix 8.4: Photomontage Methodology	APP-149	Rev0/November 2024

Document/Plan Ref.	Title	Examination Library reference	Rev./Dated
EN010147/APP/6.3	Figure 2.1a to 2.4d: Illustrative Masterplan	CR2-026	Rev2/September 2025
EN010147/APP/7.3.3	Landscape, Ecology and Amenities Plan	CR2-043	Rev3/September 2025
EN010147/APP/7.6.3	Outline Landscape and Ecological Management Plan	REP6-034	Rev 6/October 2025
EN010147/APP/6.5	PRoW and Route Assessment	REP5-037	September 2025
EN010147/APP/6.5	Representative Viewpoints	REP5-038	September 2025
EN010147/APP/17.13	RVAA Part 1 and Part 2	REP6-064 & REP6-065	October 2025

**Table 2.5: Draft DCO submission documents and plans record pursuant to Vale of White Horse District Council discussions – Noise and Vibration**

Document/Plan Ref.	Title	Examination Library reference	Rev./Dated
EN010147/APP/6.3	6.3 - ES Chapter 13 - Noise and Vibration	PDB-010	Rev1May 2025
EN010147/APP/6.4	6.4 ES - Figure 13.1 - Construction Phase Noise Study Area	APP-103	Rev0/November 2024
EN010147/APP/6.4	6.4 ES - Figure 13.2 - Construction Phase Vibration Study Area	APP-104	Rev0/November 2024
EN010147/APP/6.4	6.4 ES - Figure 13.3 - Operational Phase Noise Study Area	APP-105	Rev0/November 2024
EN010147/APP/6.5	6.5 ES - Appendix 13.1 Baseline Sound Survey	APP-211	Rev0/November 2024
EN010147/APP/6.5	6.5 ES - Appendix 13.2 Construction Phase Noise and Vibration	APP-212	Rev0/November 2024
EN010147/APP/6.5	6.5 ES - Appendix 13.3 Operational Phase Noise	APP-213	Rev0/November 2024
EN010147/APP/7.6.1	7.6.1 - Outline Code of Construction Practice - Part 1	REP6-028	Rev5/October 2025
EN010147/APP/7.6.1	7.6.1 - Outline Code of Construction Practice - Part 2	REP6-030	Rev5/October 2025
EN010147/APP/7.6.2	7.6.2 - Outline Operational Management Plan	REP6-032	Rev5/November 2025

**Table 2.6: Draft DCO submission documents and plans record pursuant to Vale of White Horse District Council discussions – Planning Policy**

Document/Plan Ref.	Title	Examination Library reference	Rev./Dated
EN010147/APP/7.1	7.1 Planning Supporting Statement inc. Green Belt Case	REP1-012	Rev1/ June 2025

### 3 Record of Relevant Correspondence

- 3.1.1 The Project has been the subject of pre-application engagement with Vale of White Horse District Council, and both parties continue to engage throughout and beyond the submission of the DCO application for the Project.
- 3.1.2 **Appendix A** identifies the discussions and correspondence that have taken place between the Applicant's project team and Vale of White Horse District Council to date.

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## 4 Summary of main issues agreed/not agreed

4.1.1 Common ground has not been possible to resolve in relation to the following elements (or sections within these):

- Landscape impact
- LVIA methodology
- Cultural heritage (built assets)
- Biodiversity
- Loss of BMV land

4.1.2 The following outline management plans submitted at Deadline 6 are agreed.

EN010147/APP/6.5	6.5 Environmental Statement Appendix 15.2 Outline Skills, Supply Chain & Employment Plan	REP6-026	Rev3/October 2025
EN010147/APP/7.6. 1	7.6.1 - Outline Code of Construction Practice - Part 2	REP6-030	Rev5/October 2025
EN010147/APP/7.6. 2	7.6.2 - Outline Operational Management Plan	REP6-032	Rev5/November 2025
EN010147/APP/7.6. 4	Outline Decommissioning Plan	REP6-036	Rev 2/October 2025
EN010147/APP/7.7	7.7 Outline Layout and Design Principles	REP6-038	Rev5/October 2025

4.1.3 The following outline management plans submitted at Deadline 6 are not agreed.

EN010147/APP/7.6. 1	7.6.1 - Outline Code of Construction Practice - Part 1	REP6-028	Rev5/October 2025
EN010147/APP/7.6. 3	Outline Landscape and Ecological Management Plan	REP6-034	Rev 6/October 2025

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## 5 Areas of Discussion between the Parties

Table 5.1: Areas of Discussion between the Parties – Ecology and Nature Conservation

Ref	Relevant Application Document	Summary of Description of Matter	Vale of White Horse District Council Current Position	Applicant Current Position	Status
5.1.1	6.3 Environmental Statement Chapter 9: Ecology and Nature Conservation (Rev 3) [REP4-010]	Survey methodology	Other than where noted below, survey scope and methodology agreed.	Other than where noted below, survey scope and methodology agreed.	Agreed.
5.1.2	6.3 Environmental Statement Chapter 9: Ecology and Nature Conservation (Rev 3) [REP4-010]	Assessment approach, scope and methodology	Other than where noted below, assessment approach, scope and methodology agreed.	Other than where noted below, survey scope and methodology agreed.	Agreed.
5.1.3	6.3 Environmental Statement Chapter 9: Ecology and Nature Conservation (Rev 3) [REP4-010]	Impacts to Ancient Woodland	Adverse impacts on Ancient Woodland are unacceptable unless there are wholly exceptional reasons, and a suitable compensation strategy exists. Priority Habitats are identified under s41 of the NERC Act 2006 as being of principle importance for the purpose of conserving and enhancing biodiversity. Adverse impacts should be avoided wherever possible, and opportunities to enhance them taken.	<p>The Project has been designed to avoid areas of ancient woodland such that none occur within the order limits. Measures would be put in place to ensure that a minimum 15 metre buffer is retained between ancient woodland and construction areas. Appropriate fencing in accordance with BS 5837, would be erected around the 15 metre buffer to prevent access by people, materials or machinery to avoid compaction of soils or roots and to avoid any accidental damage, as per Natural England guidance.</p> <p><b>November 2025 update:</b> As set out in the oLEMP [REP6-034], all ancient woodland around the Project site is included in the Tier A bat buffers and, as such, will have at least a 25m buffer surrounding them. This is considerably larger than the 15m minimum recommended by the government as set out above.</p>	Not agreed.
5.1.4	6.3 Environmental Statement Chapter 9: Ecology and Nature Conservation (Rev 2) [REP4-010]	License applications	The development will have impacts on protected and priority species. Where development activities require a derogation licence from Natural England to proceed lawfully, the Secretary of State should be satisfied that such a licence is likely to be granted when considering any relevant tests of derogation.	<p>Draft license applications will be submitted to Natural England for relevant species, in order to receive Letters of No Impediment (LONI).</p> <p><b>November 2025 update:</b> Draft licences for badger, dormice and great crested newt have been submitted to Natural England. A LONI for badgers has been received [REP6-050]. It is anticipated that LONIs for dormice and great crested newt will be received before the close of Examination.</p>	Agreed.
5.1.5	7.6.3 Outline Landscape and Ecology Management Plan (Rev 6) [REP6-034]	Skylark mitigation	Measures intended to avoid, mitigate, and compensate for impacted species should be likely to succeed and be robustly secured. VWHDC remains concerned that the proposed approach to skylark compensation, through the provision of interspersed skylark plots, is unlikely to be successful. Skylarks are an open-ground nesting species with strong anti-predator behavioural tendencies which mean that they are unlikely to	The plots are not intended to be used as mitigation for breeding skylark territories per se. Skylark plots are proposed to provide skylark with additional foraging opportunities throughout their breeding season in order to increase fecundity of species that might nest either within the archaeological areas which are spread throughout the Project site and which will be managed specifically for birds (both wintering and breeding)	Not agreed.



Ref	Relevant Application Document	Summary of Description of Matter	Vale of White Horse District Council Current Position	Applicant Current Position	Status
			utilise plots in proximity to structures, trees or boundaries. The placement of skylark plots within array complexes (close to individual panels) means that those plots are unlikely to be used for breeding.	<p>or in fields near to the Project site. The provision of Skylark plots at a ratio of two plots provided for each potential lost territory is an accepted and widely used mitigation strategy for developments that will result in the loss of Skylark territories. Skylark plots also benefit other farmland bird species.</p> <p><b>November 2025 update:</b> The Applicant's position with respect to skylark mitigation is set out in Annex 6 Skylark Technical Note of the Applicant's Response to ExQ2s [REP4-037] and expanded upon within the Applicant's response to the ExA's schedule of changes to the dDCO [REP6-051]. As set out within the Applicant's Response to The ExA's Schedule of Changes to the DCO [REP6-051], providing areas of suitable grassland for skylark within the project site area is the approach that has been adopted and accepted for all NSIP-scale solar development that has been consented that the Applicant is aware of, none of which have required any off-site mitigation provision but which have similar impacts to the Project. As such, the Applicant considers the provision of grassland within the Project site to be suitable mitigation, in line with how other consented solar NSIPs have addressed this issue.</p>	
5.1.6	6.5 ES - Appendix 9.13 Biodiversity Net Gain Assessment Rev 2 [REP6-020]	Biodiversity Net Gain	<p>NSIPs are not currently subject to mandatory BNG. However, a net positive biodiversity outcome should be targeted. Solar schemes generally tend to offer the ability to provide BNG onsite, where the original habitat is of low value. In this case, the transition from arable land to grassland underneath solar panel arrays is likely to lead to a gain. However, due to the impacts of arrays on availability of light, rainfall, humidity and management, it is recommended that a precautionary approach is taken when considering the value of grasslands that can be created and maintained as part of the proposals.</p> <p>The Secretary of State should be content that a thorough and evidenced BNG assessment has been completed and that the establishment and ongoing maintenance of habitats is secured robustly. Should VWHDC be required to take on monitoring or enforcement functions, suitable financial contributions should be secured to ensure that this is possible.</p> <p>It should also be noted that in the LIR [REP1-072] the issue of BNG monitoring was raised, and the need for the applicant to provide a contribution to the councils to ensure adequate resourcing for this monitoring. It is noted that the oLEMP was updated at D6 to state that the applicant will</p>	<p>The calculation of the project's Biodiversity Net Gain (BNG) is set out in the Biodiversity Net Gain Assessment, provided in Volume 3, Appendix 9.13 [REP6-020].</p> <p>BNG for Nationally Significant Infrastructure Projects is expected to become a requirement from late November 2025, expected to be set at 10% BNG.</p> <p>The outline maintenance and monitoring of BNG landscape elements of the site is set out in the Outline Landscape and Ecology Management Plan (oLEMP) [REP6-034]. The OLEMP is part of the project's embedded mitigation and will be secured in the Development Consent Order Rev 9 (DCO) [REP7-xxx].</p> <p><b>November 2025 update:</b> ES Appendix 9.13 Biodiversity Net Gain Assessment was updated at Deadline 6 [REP6-019] to incorporate the watercourse module of the BNG assessment and to provide the supporting surveys. The assessment showed that the Project would achieve at least 20% watercourse BNG. Combined with the other measures shows at least 70% for habitat BNG and 50% for hedgerow BNG.</p>	Not agreed.



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			undertake all monitoring and provide the councils with an annual report.	With respect to a precautionary approach to the assessment of grassland under panels, this has been acknowledged within ES Appendix 9.13 with the adoption of a poor condition for the grassland to ensure this habitat is not over valued within the assessment.	
			This is welcomed but is not an acceptable solution as this would essentially result in the applicant monitoring themselves. Independent review by the LPA is required to verify the applicant's BNG monitoring especially considering that if the applicant fails to implement their BNG strategy, they would be in breach of Requirement 7 of the DCO.		
5.1.7	7.6.3 Outline Landscape and Ecology Management Plan (Rev 6) [REP6-034]	Farmland birds	At D6 the applicant has still not committed to a Farmland Bird Strategy. The OHA have outlined why this is necessary in the LIR [REP1-072], [REP5-125] and [REP6-117].  The applicant at D6 had not agreed to the Examining Authorities proposed requirement for a Farmland Bird Strategy.	As discussed at ISH2, the Applicant's position with respect to the request for a Skylark Mitigation Strategy (rather than a Farmland Bird Strategy) is set out in the Applicant's Response to the ExA's Schedule of Changes to the dDCO [REP6-051].	Not agreed.

**Table 5.2: Areas of Discussion between the Parties – Historic Environment**

Ref	Relevant Application Document	Summary of Description of Matter	Vale of White Horse District Council Current Position	Applicant Current Position	Status
5.2.1	ES Chapter 7: Historic environment [CR2-019]	Assessment approach, scope and methodology.	Other than where noted below, assessment approach, scope and methodology agreed.	Other than where noted below, assessment approach, scope and methodology agreed.	Agreed.
5.2.2	ES Appendix 7.3: Geophysical Survey Report [APP-133 – APP-140]	Methodology for geophysical surveys.	The application of the geophysical survey methodology within the Project Site is acceptable.	The application of the geophysical survey methodology within the Project Site is acceptable.	Agreed.
5.2.3	ES Chapter 7: Historic environment [CR2-019]	The level of harm to the significance of designated heritage assets.	All harm to the significance of designated heritage assets is less than substantial, therefore the correct policy test is the one set out in paragraph 5.9.32 of NPS EN-1.	All harm to the significance of designated heritage assets is less than substantial, therefore the correct policy test is the one set out in paragraph 5.9.32 of NPS EN-1.	Agreed.
5.2.4	ES Appendix 7.5: Settings Assessment (Rev 3) [CR2-038]	The likely impact and effect on the Grade II listed Red House Farmhouse as a result of change within its setting.	Red House Farm, a grade II listed farmhouse which lies to the north east of the application site is noted as likely to suffer a Negligible Adverse impact because of the development within its setting. This is due to a loss of the character of the agricultural land to which it was historically related, and which still forms part of its wider context.  It is acknowledged that there will be no direct impact to the listed building. However, the manner of the agricultural countryside in which the building sits will be eroded by the presence of the proposed PV panels. The way the historic function of the farmhouse and its associated agricultural buildings is understood will be somewhat eroded by the loss of wider agricultural land.  It is also noted that grazing is proposed under the panels, but this will not be readily visually understood beyond the 2.2m – 2.3m height of the panels, the fencing, proposed lighting and security systems and other infrastructure which will result in a semi-industrial appearance to the land instead of one of rolling Oxfordshire Countryside. An area of landscape enhancement is proposed to the north of the area in proximity to Red House Farm	The Applicant's assessment of the likely impact on the heritage significance of the Grade II listed Red House Farmhouse is presented in paragraphs 1.9.135 – 1.9.138 of ES Appendix 7.5: Settings Assessment (Rev 3) [CR2-038].  The assessment considers the wider rural setting of the farmhouse, particularly the land to the south. The nearest proposed solar PV panels would be 450 m from the farmhouse, therefore a sizeable buffer of this rural landscape would be retained. The Applicant maintains that the heritage significance of the farmhouse would be barely affected, therefore the correct likely magnitude of impact is 'negligible adverse', resulting in a long-term, reversible, 'negligible adverse' effect which is not significant in EIA terms.  The Applicant agrees that this harm to the significance of the Grade II listed building should be weighed against the public benefits of the proposed development in accordance with national tests, specifically the test set out in paragraph 5.9.32 of NPS-EN1.	Not agreed.

Ref	Relevant Application Document	Summary of Description of Matter	Vale of White Horse District Council Current Position	Applicant Current Position	Status
			<p>however this will only provide visual mitigation to some areas in the setting of the listed building. It will remain largely exposed and a change to the character of the land with some proposed hedgerow planting along the boundary edge used to soften it. Hiding the scheme behind hedgerows and enclosing PRoW with high hedges will also significantly change the way in which the character of the agricultural landscape can be experienced which is not necessarily encouraged as mitigation.</p> <p>Although there is some intervening land remaining as an agricultural buffer to the farmhouse and farm group, the impact goes beyond negligible in my opinion and will have an adverse impact on the manner in which the listed building is understood and gains significance from its wider context. The impact is Minor Adverse and should be outweighed by public benefits as per National and Local Policy Tests.</p>		
5.2.5	ES Appendix 7.5: Settings Assessment (Rev 3) <b>[CR2-038]</b>	The consideration of likely impacts and effects on heritage assets as a result of the construction and operation of the NGET substation.	<p>The lack of information about the NGET substation which is anticipated to be very large and sited somewhere in or adjacent to the southern parcel substation is a concern. Although it will occupy a smaller area than the fields of panels, the scale of the infrastructure needed is unlike anything else in this area and will likely rely heavily on topography to reduce the impact from some areas.</p> <p>There is a real concern that the impacts will be entirely unmitigated due to necessity if the proposal is granted approval. It should therefore be proposed alongside this scheme in order that it can all be appropriately impact assessed with holistic mitigation used where possible.</p> <p>The indicative scale of the Main and Secondary Substations (Work No.3a and 3b on the Works Plans) are very large structures in an area not characterised by built form of any real scale beyond historic farm buildings. It is clear even from these visualisations that this will result in a significant change to the character of the landscape and its contribution to nearby assets. The impact of this has not been fully assessed as specific plans do not appear to form part of this application. This forms a fundamental part of the overall proposal being a necessary part of the scheme for it to become operational. Likewise, the NGET connection is an absolute necessity for the scheme but there are no details provided other than the anticipated size of the building footprint, and a 15m height on an area of land up to 3.8ha in area. This will have a considerable impact on the character of the area that forms the setting of the assets noted above.</p>	Where relevant, the location and likely scale of the National Grid Substation, including dimensions, have been included within the assessment of likely impacts and effects presented in ES Appendix 7.5: Settings Assessment (Rev 3) <b>[CR2-038]</b> . This substation is mentioned in the assessment regarding Red House Farmhouse (paragraphs 1.9.135 – 1.9.138), Upper Whitely Farmhouse (paragraphs 1.9.139 – 1.9.142) and also Tumbledown Cottage (paragraphs 1.9.182 – 1.9.185).	Not agreed.
5.2.6	ES Chapter 7: Historic environment <b>[CR2-019]</b>	The use of the terms ‘reversibility’ and ‘temporary’ within the assessment of impacts and effects.	Heritage impacts are consistently concluded as being reversible. Paragraph 1.10.6 of Appendix 7.5: Settings Assessment for example concludes "All effects would be fully reversible." This is on the basis that the proposal is ‘temporary’ in nature for a period of 45 years. Discussion and debate on how much weight should be given to this 45-year period should form part of a robust balancing exercise. This period would mean that an entire generation will experience the proposed semi-industrial appearance of the landscape as the character which forms the setting of these assets. This would also result in a large proportion of the population not experiencing the reinstatement of the agricultural landscape in the setting of these again in their lifetime.	<p>Reversibility is a consideration that is commonly taken into account when planning decision-makers are considering impacts and effects on the environment. For example, paragraph 2.8.352 of the National Policy Statement for Renewable Energy Infrastructure (NPS EN-3) which deals with seascape and visual effects arising from offshore wind projects states ‘Where adverse effects are anticipated either during the construction or operational phases, in coming to a judgement the Secretary of State should consider the extent to which the effects are temporary or reversible’.</p> <p>The assessment of likely impacts and effects resulting from changes within the settings of heritage assets is presented in</p>	Not agreed.

Ref	Relevant Application Document	Summary of Description of Matter	Vale of White Horse District Council Current Position	Applicant Current Position	Status
			<p>For these reasons it is recommended that it should be carefully considered how much weight ‘temporary’ should be given and whether assessment should be as if the proposed works will be permanent in terms of how heritage assets are experienced by a generation. This should also be considered against the proposed environmental and bio-diversity enhancements which are likely to become permanent features in the landscape.</p>	<p>ES Appendix 7.5: Settings Assessment (Rev 3) <b>[CR2-038]</b>. In this document, the reversibility of effects is noted but does not actually form part of the assessment process, i.e. the assessed magnitude of impact and hence the level of effect do not take account of the reversibility or irreversibility of the impact. The word ‘temporary’ does not appear in the assessment of likely impacts and effects resulting from changes within the settings of heritage assets presented as ES Appendix 7.5: Settings Assessment (Rev 3) <b>[CR2-038]</b>. In that document the impacts and effects are described as ‘long-term’.</p> <p>Within ES Chapter 7: Historic environment (Rev 3) <b>[CR2-019]</b> the term ‘time-limited’ is also used. The use of the terms ‘temporary’ and ‘time-limited’ should be seen in the context of national planning policy, specifically paragraph 2.10.66 of NPS-EN3 which addresses the project lifetime of solar farm developments and which states ‘<i>Time limited consent, where granted, is described as temporary because there is a finite period for which it exists, after which the project would cease to have consent and therefore must seek to extend the period of consent or be decommissioned and removed</i>’. The preceding paragraph of NPS-EN3 refers to an upper limit of 40 years as typical (for solar farm developments). Therefore, it is clear that national policy regards impacts arising from time-limited consents for solar farms as ‘temporary’.</p> <p>The Applicant agrees that some of the proposed environmental mitigation measures may become permanent features in the landscape, specifically any new hedgerows that are planted as part of the mitigation for likely landscape and visual effects. Any new hedgerows would thus become part of the setting of heritage assets and would also be a ‘new’ element of the historic landscape. However, the removal and adjustment of field boundaries is a continuous process as landscape change over time. Major changes can occur such as the change from the medieval open-fields to enclosure landscapes such as those seen across most of Oxfordshire, but most change is much more gradual. The insertion of new hedgerows required for the proposed development is unlikely to result in a significant impact on heritage assets or on the overall character of the historic landscape.</p>	

Table 5.3: Areas of Discussion between the Parties – Agricultural Land Use and Public Rights of Way

Ref	Relevant Application Document	Summary of Description of Matter	Vale of White Horse District Council Current Position	Applicant Current Position	Status
5.3.1	ES Chapter 17: Agricultural land use and Public Rights of Way [APP-054].	Over 40% (216ha) of the land proposed for solar PV would be on BMV land, with 80.5ha of productive arable land in the Vale, and at least 4ha permanently lost to the National Grid substation, highlighting concerns about the cumulative impacts of solar development on BMV land.	<p>The permanent loss of BMV land needs to be weighed in the planning balance.</p> <p>The applicant considers agricultural use will continue in the form of conservation grazing, primarily by sheep and some small-scale horticultural production areas for use by community food growing groups ([APP-043] paragraph 6.1.4) – this is not considered a viable replacement for loss of arable to mitigate the loss of BMV.</p> <p>Agricultural land which is Grade 2 and 3a quality should be removed from the scheme.</p>	<p>The ALC and soil surveys (Table 2 of ES - Appendix 17.1 [APP-223]) determined that 38.35% of the Project site comprises Best and Most Versatile (BMV) agricultural land (Grades 1, 2, and 3a), while 61.65% is subgrade 3b or non-agricultural land. The Applicants have sought to avoid impacts on BMV land by siting permanent infrastructure away from these areas (ES Chapter 5 [APP-042]). Only 5.5 ha of BMV land would be permanently lost during construction, which is not significant in EIA terms (ES Chapter 17 [APP-054], paragraph 17.9.6).</p> <p>Temporary impacts on agricultural land quality and soils during construction of the construction compounds, solar PV array, cable corridors and access tracks will be managed through the Soil Management Plan, ensuring soil quality is maintained (ES Chapter 17 [APP-054], paragraph 17.9.8). Solar PV modules will be mounted on steel piles or screws, causing temporary soil displacement but no permanent loss of soil function (ES Chapter 6 [APP-043], paragraph 6.4.10; ES Chapter 17 [APP-054], paragraph 17.9.8).</p> <p>The Applicant proposes to retain agricultural land use under solar arrays, between converter stations and substations, and in undeveloped areas, using conservation grazing by sheep and small-scale horticultural production (ES Chapter 6 [APP-043], paragraph 6.1.4). This agrivoltaic approach has been adopted in other DCO applications, such as Cleeve Hill Solar Park (2020), Little Crow Solar Park (2022), and Sunnica Energy Farm (2024). The commitment to retain agricultural land use is included in the Outline Landscape and Ecology Management Plan [REP6-034], secured under Requirement 11 of the Draft DCO Rev 9 [TBC].</p> <p>Table 17.23 of ES Chapter 17 [APP-054] sets out the other projects, plans and activities considered in the CEA for agricultural land use and PRoW, which include other solar developments within the cumulative study area. The cumulative impacts between the Project and other proposed developments, including nearby solar developments on agricultural land quality and land use are considered in section 17.11 of ES Chapter 17 [APP-054].</p>	Not agreed.



Table 5.4: Areas of Discussion between the Parties – Landscape and Visual Resources

Ref	Relevant Application Document	Summary of Description of Matter	Vale of White Horse District Council Current Position	Applicant Current Position	Status
5.4.1a	[REP6-012] Chapter 8: Landscape and Visual Impact Assessment	LVIA Methodology	It is agreed that these documents form the industry standard guidance used to inform scope and methodology used in LVIA.	<p>The key (industry standard) guidance documents used to inform scope and methodology used in Landscape and visual Impact Assessment (LVIA) by landscape professionals are the Guidelines for Landscape and Visual Impact Assessment: Third Edition (LI and IEMA, 2013) GLVIA3 and Landscape Institute Technical Guidance Notes, including Landscape Institute Technical Guidance Note 2024-01: Notes and Clarifications of the Guidelines for Landscape and Visual Impact Assessment: Third edition (GLVIA3) (LI TGN2024-01), and was agreed at a meeting with the OHAs dated 10<sup>th</sup> June 2025. This was further clarified at the meeting with the OHAs held on 16<sup>th</sup> October 2025*.</p> <p>*The Applicant notes that representatives from Cherwell District Council did not attend this meeting, but all other OHAs were represented, as well as a representative from LUC, LUC appears to be the landscape consultancy representing/providing advice to the OHAs.</p>	Agreed.
5.4.1b	[REP6-012] Chapter 8: Landscape and Visual Impact Assessment	LVIA Methodology	<p>Whilst accepting the industry best practice guidance set out above in 5.4.1a, this does not translate to agreement of the applicant's methodology. VWHDC remains concerned that the applicant has not used these documents in preparing their LVIA, relying on the use of Design 'Manual for Roads and Bridges (DMRB) LA104 and LA107 instead.</p> <p>In paragraph 1.2.29 of the applicant's response to the OHA's response to the Rule 17 Letter <b>[REP3-066]</b> the applicant stated 'The Applicant's Position – The use of the National Highways Standard significance of effects matrix (DMRB LA104, Table 3.8.1) adapted to reflect LVIA terminology (Table 8.12 of APP-045) is appropriate for the Botley West Solar Farm project.'</p> <p>VWHDC remains concerned about the use and how the applicant has applied the Design 'Manual for Roads and Bridges (DMRB) LA104 and LA107 for a solar development. Basing the assessment methodology and tables on the DMRB LA107, the applicant then does not reflect the level of significance as covered in LA104. Page 15 of the Design Manual for Roads and Bridges (DMRB) LA104 (Highways England et al. 2020) guidance NOTE 3 states significant effects typically comprise residual effects that are within the moderate, large or very large categories.</p>	The Applicant believes that the DMRB template, used in the ES by other topics (as a preferred approach to ES chapters – promoted by the OHAs) modified to accommodate the LI guidance, as the Landscape Institute requires is appropriate for the assessment of solar farms.	Not agreed.
5.4.1c	[045REP6-012] Chapter 8: Landscape and Visual Impact Assessment	LVIA Methodology	The OHAs agree that this is what the text of GLVIA3 states. It is agreed by the OHAs that this is what GLVIA3 states.	<p>GLVIA3 recommends that an LVIA <i>"This edition concentrates on principles and process. It does not provide a detailed or formulaic 'recipe' that can be followed in every situation – it remains the responsibility of the professional to ensure that the approach and methodology adopted are appropriate to the task in hand. The aim has been to make the advice specific enough to meet the needs of UK practitioners but also to avoid too much detail about specific legislation which will make it of less value elsewhere."</i> (preface to GLVIA3, Roman numeral page x).</p> <p>On determining significance GLVIA3 explains that <i>"The Regulations require that a final judgement is made about whether or not each effect is likely to</i></p>	Agreed.

Ref	Relevant Application Document	Summary of Description of Matter	Vale of White Horse District Council Current Position	Applicant Current Position	Status
				<p><i>be significant. There are no hard and fast rules about what effects should be deemed ‘significant’ but LVIA’s should always distinguish clearly between what are considered to be the significant and non-significant effects. Some practitioners use the phrase ‘not significant in EIA terms’ to describe those effects considered to fall below a ‘threshold’ of significance but this can potentially confuse since the phrase has no specific meaning in relation to the EIA Regulations (IEMA, 2011b: 61 (GLVIA3, paragraph 3.32).</i></p> <p>Paragraph 3.33 explains that “It is not essential to establish a series of thresholds for different levels of significance of landscape and visual effects, provided that it is made clear whether or not they are considered significant. The final overall judgement of the likely significance of the predicted landscape and visual effects is, however, often summarised in a series of categories of significance reflecting combinations of sensitivity and magnitude. These tend to vary from project to project but they should be appropriate to the nature, size and location of the proposed development and should as far as possible be consistent across the different topic areas in the EIA.”GLVIA3 recommends that an LVIA “concentrates on principles and process” and “does not provide a detailed or formulaic recipe” to assess effects, it being the “responsibility of the professional to ensure that the approach and methodology are appropriate to the task in hand” (preface to GLVIA3, Roman numeral page x).</p>	
5.4.1d	[REP6-012] Chapter 8: Landscape and Visual Impact Assessment	LVIA Methodology	<p>Whilst the OHA agree that the quote is taken from 3(5):LI TGN2024-01, the OHA did not agree anything at the meeting 16<sup>th</sup> October 2025.</p> <p>Whilst VWHDC agree that GLVIA3, as clarified in LI TGN 2024 01, is best practice guidance, this does not translate to agreement of the applicant's methodology and how the applicant has applied the methodology to assessed effects. In paragraph 1.2.29 of the applicant's response to the OHA's response to the Rule 17 Letter [REP3-066] the applicant states ‘The Applicant's Position – The use of the National Highways Standard significance of effects matrix (DMRB LA104, Table 3.8.1) adapted to reflect LVIA terminology (Table 8.12 of APP-045) is appropriate for the Botley West Solar Farm project.’</p> <p>It should be noted that 3(5):LI TGN2024-01 also states “Make sure the methodology clearly states the basis on which effects are judged as ‘significant’, and check that judgements are consistent with this (see GLVIA3 paragraph 3.23.).” Para 3.23 refers to the significant effects in EIA Directive and UK Regulations.</p>	<p>It was agreed at the meeting with the OHAs on the 16<sup>th</sup> October 2025 that at issue 3(5) of LI TGN 2024-01 it states “As indicated at GLVIA paragraph 3.33, it is not necessary to establish thresholds for levels of significance, provided that it is made clear whether effects are significant are, or are not, significant. However, typically, effects falling below the middle of the range of overall effects are assessed as not significant. For example, if using a scale of minor/ moderate/ major, then major effects will be significant and minor effects will not be significant. In this example, moderate effects may or may not be significant and justification would be needed in the methodology or receptor assessment as to whether a moderate effect is significant or not.”</p>	<p>Text of LI TGN 2024-01, issue 3(5) - Agreed</p> <p>Applicant's methodology - Not agreed.</p>
5.4.1e	[REP6-012] Chapter 8: Landscape and Visual Impact Assessment	LVIA Methodology	The applicant bases their assessment methodology and tables on Design Manual for Roads and Bridges LA107 but does not reflect levels of significance as covered by LA104, i.e. that Significant effects typically comprise residual effects that are within the moderate, large or very large categories. It is noted that the applicant has been guided by the latest Landscape Institute guidance LI TGN 2024-01 and	<p>The assessment methodology used within the Botley West Environmental Statement (ES) is based on the DMRB (National Highways, Standards for Highways) as set out in paragraph 4.2.9 of Chapter 4: Approach to Environmental assessment [APP-041].</p> <p>The two relevant documents published as part of the National Highways Standards are LA104 – Environmental assessment and monitoring (revision</p>	Not agreed.

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			<p>has judged moderate effects to be significant and not significant.</p> <p>LI TGN 2024-01 issue 9(3) ‘<i>The Design Manual for Roads and Bridges (DMRB)</i> is a standard (not just guidance) relating to the design, assessment and operation of motorway and all-purpose trunk roads in the United Kingdom. Part LA 107 Landscape and visual effects contain the requirements for assessing and reporting the landscape and visual effects of highway projects. GLVIA3 should be used for all other project types.</p> <p>VWHDC consider that as the applicant uses LA107 it should have used the guidance in full, including the significance levels of LA104.</p>	<p>1) (August 2020) and LA107 – Landscape and visual effects (revision 2) (February 2020).</p> <p>The DMRB notes that significance of effects is judged on the effects that remain after the mitigation has taken place, i.e. the residual effects.</p> <p>The Botley West Landscape and Visual Impact Assessment significance of effects matrix is based on the DMRB matrix used in other chapters of the ES, albeit adapted to reflect more recent GLVIA3 guidance. LI TGN 2024-01 issue 3(5), which states that moderate effects can be significant or not significant. this is reflected in paragraph 8.3.1 of the text of Rev 4 of Chapter 8 [REP6-012]. Also, the ‘No Change’ column has also been removed, as LVIA assessment concentrates on potential significant effects.</p> <p>The Applicant’s Position – DMRB LA107 is the base methodology used within the ES, by the other disciplines, which has not been questioned by their corresponding specialists either within the OHAs or by other statutory consultees.</p> <p>The use of the National Highways Standard significance of effects matrix (DMRB LA104, Table 3.8.1) adapted to reflect LVIA terminology (Table 8.12 of APP-045) is appropriate for the Botley West Solar Farm project.</p>	
5.4.1f	[REP6-012] Chapter 8: Landscape and Visual Impact Assessment	LVIA Methodology	It is agreed by the OHAs that the EIA Regulations do not set out methodologies, thresholds or state what effects should be considered significant or not	It is agreed that the EIA Regulations do not set out methodologies, thresholds or state what effects should be considered significant or not	Agreed.
5.4.1g	[REP6-012] Chapter 8: Landscape and Visual Impact Assessment	LVIA Methodology	<p>The OHA agree that GLVIA3 and subsequent technical notes is the accepted best practice guidance. The reference in para.3.32 discusses significant thresholds and refers to page 61 of IEEMA 2011 in this context. GLVIA3 is from 2013 and is, together with subsequent guidance notes, the accepted guidance that should be used.</p> <p>However, it should be noted that the IEMA document at page 61 also states ‘<i>Problems arise in practice when the ES fails to either: justify the use of different methods to evaluate significance between topic chapters, or present the significance of effects related to a particular environmental issue</i>’ and ‘<i>As such, there is a clear need to ensure that all the findings set out in the ES are evaluated in terms of their significance; ideally this would be in a format that allows them to be readily compared with the EIA’s other findings.</i>’</p> <p>As such, whilst the IEMA 2011 document does indeed include the quote provided by the applicant, section 6.3 when read as a whole promotes a consistent approach to assessments of significance throughout the ES. The document specifically identifies that the downside of not doing so is that consenting authorities do not feel like they have sufficient information on a development’s likely environmental effect.</p> <p>Whilst VWHDC agree that the IEMA 2011 documents outlines there is no <i>legal</i> requirement to follow a set approach within an ES, when read in the full context of the document, it supports a consistent approach amongst ES chapters to aid consenting authorities.</p>	<p>It is agreed that the IEMA document ‘The state of environmental impact assessment in the UK’ (Institute of Environmental Management and Assessment, 2011) (IEMA 2011) explains that there is no legal requirement to follow a set approach – in fact it is common for certain topics not to follow a set approach.</p> <p>LVIA is not a scientific discipline – it deals with perceptual qualities and relies on professional judgement.</p> <p>IEMA 2011 notes that “<i>In reporting the EIA’s findings, ESs often set out a generic methodology at the start of the document indicating that significance has been assessed using a standard matrix style approach, with magnitude on one axis and receptor sensitivity on the other</i>” ... “<i>Despite this, it remains relatively common for one or more ES chapters to use an alternative approach. This is not a legal concern, as there is no regulatory requirement to apply the same methodological approach to significance evaluation across an EIA. In some cases significance may be linked to whether the predicted effect passes a quantified threshold established in a relevant standard.</i>” (IEMA 2011, page 60, section 6.3).</p> <p>On consistency of significance, “<i>IEMA’s Guidelines on EIA indicate: ‘There is often not a single, definitive, correct answer as to whether an impact is significant or not. Significance is influenced by the values of the individual, how the changes to the environment affect them and whether they have a stake in the project or not’ The evaluation of significance in EIA is often subjective. In order to provide justifiable results, EIA practitioners gather evidence to inform and explain the evaluation of the individual effect. Effective EIA practice ensures that the methods used can be readily understood by those reading the ES. EIA does not tend to discuss significance in absolute terms. Instead, the assessment’s findings are regularly set out as different levels of significance (e.g. major, moderate, minor, etc).</i></p> <p><i>This approach is considered good practice; whilst recognising the inherent subjectivity of the assessment, it attempts to aid communication of the scale of the impact by introducing a classification. This approach also allows the</i></p>	Not agreed.



Ref	Relevant Application Document	Summary of Description of Matter	Vale of White Horse District Council Current Position	Applicant Current Position	Status
			VWHDC do not consider the methodology used for the Mona offshore wind farm, Morgan offshore wind farm and Gatwick Genesis are comparable to this NSIP solar development.	<p><i>practitioner to identify and discuss effects that some groups may consider significant, whilst others would not. For example, a negative landscape effect described as being of 'minor significance' might be considered to indicate that a majority of people would not consider the effect to be significant; however, a smaller group, perhaps within the local community, may disagree and consider the effect to be significant. It also allows for the comparison of impacts across seemingly incomparable topics by providing a consistent basis for the assessment's terminology.</i>" (Section 6.3, page 60).</p> <p>On determining the significance thresholds of effects IEMA 2011 notes that "... the EIA regulations do not set out terms for evaluating whether the assessment's findings are significant or not" (IEMA 2011, page 61, section 6.3).</p> <p><b>REP2-029</b> notes that the IEMA 2011 document above is referred to in GLVIA3, paragraph 3.32 and has not been superseded, and the points made in it remain relevant.</p> <p>The Applicant's position is that it has justified the methodology used in the LVIA throughout the Examination. It is a methodology that has not been challenged at (most recently) three consented DCOs, Mona offshore wind farm Morgan offshore wind farm and Gatwick Genesis.</p>	
5.4.2a	<b>[REP6-012]</b> Chapter 8: Landscape and Visual Impact Assessment	Assignment of significance	<p>OHAs do not consider that the subsequent changes to the LVIA during the examination have addressed issues regarding assignment of significance. See Section 7.3 as well as Appendix 1 of the LIR <b>[REP1-072]</b>.</p> <p>Although additional paragraphs, sections and additional appendices have been added to the LVIA since submission, these do not satisfactory address concerns about how the site has been assessed, the quality of the LVIA, and how it has informed the selection and iterative approach to the design of the site area to reduce effects.</p> <p>There have been very limited changes in the assessment outcomes, and there are still concerns that the LVIA seriously underplays the scale of the effects of the development on landscape character and views, especially regarding the expected Magnitude of impact, and therefore the significance of the effect.</p> <p>These issues were raised in the OHA Joint Local Impact Report <b>[REP1-072]</b>. While the amended LVIA <b>[CR2-022]</b> has added paras 8.5.17 and 8.5.19 to address the duration and reversibility of effects, the LVIA methodology is still not clear how these effects are weighted with regards to size, scale and geographical extent, which also inform the Magnitude judgement within the impact assessment. The LVIA reports most of the Magnitude judgements as Low (leading to effects being considered not significant), or when a Medium magnitude is given, it is not judged to result in the expected Moderate to Major level of significance as per Table 8.22.</p>	<p>The latest version of Chapter 8 (Rev 4) <b>[REP6-012]</b> includes the updates of the Applicant's Rule 17 Response <b>[REP2-029]</b> Which reconsidered the significance of effects, providing a detailed explanation within each resource/receptor as to why some Moderate effects are now considered significant and some remain as not significant,</p> <p>The Applicant firmly disagrees that their LVIA is deficient on 'quality' as the LPA allege, as it was undertaken by experienced, competent professionals. The Applicant accept that there is disagreement between the parties with how the LVIA methodology was applied and their assessment of effects (as those aspects depend upon opinion), but that should not be interpreted as in any way deficient or not in accordance with best practice.</p>	Not agreed.



Ref	Relevant Application Document	Summary of Description of Matter	Vale of White Horse District Council Current Position	Applicant Current Position	Status
			It is also noted that the assessment of the same receptors differs between different sections of the LVIA and appendices.		
5.4.2b	<b>[REP6-012]</b> Chapter 8: Landscape and Visual Impact Assessment	Assignment of significance	The OHAs believe that the LVIA <b>[REP6-012]</b> has, in many cases, underplayed the level of significance for a number of Representative Viewpoints.	The Applicant's current position remains as follows:  The LVIA follows Landscape Institute and IEMA guidance. The assessment within Chapter 8: Landscape and Visual Impact Assessment <b>[REP6-012]</b> uses the methodology set out at sections 8.4 and 8.5 of the submitted LVIA <b>[REP6-012]</b> . The methodology and its application is clear and transparent, as required by GLVIA3 (e.g. at paragraph 2.24).	Not agreed.
5.4.3	<b>[REP6-012]</b> Chapter 8: Landscape and Visual Impact Assessment.	Suitability of representative viewpoint selection and photomontages	<p>The Host Authorities have outlined their concerns around viewpoints throughout the examination including at <b>[REP2-049]</b>, <b>[REP3-072]</b> (page 17-18 and 37), <b>[REP4-041]</b> (page 6-9), <b>[REP6-117]</b> (page 23).</p> <p>To clarify, correspondence with the applicant in 2022 was about initial viewpoint selection before site visits where completed, there was no objection to the viewpoints chosen by the applicant, but it has been expressed all along that there are additional viewpoint locations that should be covered.</p> <p>VWHDC clearly stated that they had concerns with the range viewpoints at the Scoping stage (note ZTV only contained solar modelling at this stage), and these concerns were also expressed at PIER stage (still no fully modelled ZTV, solar only) and then again in the DCO application. At no point did the location and number of viewpoints change in this process. The 55 viewpoints presented at Scoping and has stayed at 55 viewpoints at PIER and DCO. VWHDC therefore does not know how the narrative in the EIA Table 8.5 Summary of scoping responses can imply that additional viewpoints were added after Scoping when the number and location of viewpoints were not changed.</p> <p>Aerial viewpoints</p> <p>Aerial viewpoints have not been requested by VWHDC.</p>	<p>The Applicant's current position remains as follows:</p> <p>The candidate representative viewpoints were presented on a ZTV at Scoping. The viewpoints were consulted on with VoWHDC on the 13.10.2022, Subsequent emails to and from Avril Williams up to and including 30.11.2022. Details of alternative / additional viewpoints included in Table 8.5 of LVIA <b>[REP6-012]</b>.</p> <p>Of the 55 Representative Viewpoints, 33 were selected for photomontages <b>[APP-072 to APP-080]</b>. These were agreed with the local planning authorities and are considered appropriate and proportionate to the Project and illustrate the Project at winter Year 1 and summer Year 15, in accordance with the LVIA methodology and best practice guidance <b>[APP-149]</b>. It would have not been appropriate to have illustrated photomontages from all Representative Viewpoints, as there were a number with limited or no views of the Project. However, all viewpoints are included within the assessment of effects in the submitted LVIA <b>[REP6-012]</b>.</p> <p>Aerial viewpoints</p> <p>At no point were aerial viewpoints suggested, either by the Applicant or by the OHAs. GLVIA3 only mentions aerial imagery twice, in the context computer-generated 3D models (paragraphs 8.28 and 8.29). Moreover, GLVIA3 explains that such <i>models</i> “do not necessarily represent the way that people would experience the change [in view] and so can be misleading in an assessment context” (GLVIA3, paragraph 8.29). This is especially true of people within vehicles including aircraft, travelling at speed on the approach to, or taking off from airports.</p> <p>The transient nature of potential views available from the air and the enclosed nature of the aircraft would reduce the sensitivity of the visual receptor to such a degree that there is no potential for significant effects. Land-based dynamic receptors are considered at paragraphs 8.6.44 to 8.6.65 of the LVIA <b>[REP6-012]</b>.</p>	<p>Position on representative viewpoints - Not agreed.</p> <p>Position on aerial viewpoints – Agreed.</p>
5.4.4a	<b>[REP6-012]</b> Chapter 8: Landscape and Visual Impact Assessment.	Mitigation	<p>OHAs and other RRs have questioned the suitability of mitigation proposals.</p> <p>Concerns around mitigation are addressed in Section 7.3 and Appendix 1 of the LIR <b>[REP1-072]</b>.</p> <p>The concerns around mitigation are summarised in the Councils' response to ExQ2.9.4 <b>[REP4-074]</b> (page 35).</p> <p>VWHDC has indicated what they would consider to be acceptable landscape mitigation in the form of the omissions maps as updated a D6 <b>[REP6-118]</b>.</p>	<p>The Applicant's current position remains as follows:</p> <p>Project impacts will be minimised by a comprehensive designed in mitigation scheme. As shown on the Illustrative Masterplan <b>[CR2-026]</b> and the Landscape, Ecology and Amenities Plan <b>CR2-043]</b>. Existing public rights of way would have managed hedgerows and trees to the north and south, where appropriate, which over time would limit available views to the solar arrays.</p> <p>The Project's main elements, the solar panels, would be low in height, at a maximum of 2.3m, and follow the natural contours of the landscape. This would help to reduce the effects upon the undulating landform of the Evenlode Valley and local area within which the Project is located.</p> <p>Regarding residual landscape and visual effects - the solar farm is a Critical National Priority (CNP) infrastructure project. NPS EN-1 explains that</p>	Adequacy/ suitability of mitigation proposals - Not agreed.

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				<p><i>“infrastructure to achieve our energy objectives national security, economic, commercial, and net zero benefits, will in general outweigh any other residual impacts not capable of being addressed by application of the mitigation”</i> (NPS EN-1, paragraph 3.3.63). The NPS explains further that with <i>“projects which qualify as CNP Infrastructure, it is likely that the need case will outweigh the residual effects in all but the most exceptional cases. This presumption, however, does not apply to residual impacts which present an unacceptable risk to, or interference with, human health and public safety, defence, irreplaceable habitats or unacceptable risk to the achievement of net zero”</i> (NPS EN-1, paragraph 4.1.7). The residual landscape and visual effects, after the proposed mitigation do not present an unacceptable risk to the matters listed.</p>	
5.4.4b	<b>[REP6-012]</b> Chapter 8: Landscape and Visual Impact Assessment.	Mitigation/Design Review Panel	It is agreed by the OHAs that a meeting / review by an independent Design Review Panel post-Examination (a suggestion proposed by the ExA) would not be of assistance to developing the project.	It is agreed with the OHAs that a meeting/ review by a Design Review Panel post-Examination (a suggestion proposed by the ExA at ExAQ1.1.12) would not be of assistance to developing the project	Agreed.
5.4.4c	<b>[REP6-012]</b> Chapter 8: Landscape and Visual Impact Assessment.	Mitigation	<p>OHA comment on the applicant’s offer in their D7 submissions. While the proposed removal of areas by the applicant is welcomed, these do not go far enough to deliver a scheme that minimises landscape and visual impacts to a more acceptable level.</p> <p>VWHDC has indicated what they would consider to be acceptable landscape mitigation in the form of the omissions maps as updated a D6 <b>[REP6-118]</b>.</p>	<p>The Applicant’s position remains that the design process that took place before submission was an iterative one, one example of this is the PVDP Buffer Zone Analysis, Appendix B of <b>REP6-065</b>. The panels have been located less sensitive landscape areas as explained in <b>[REP6-052]</b>. The mitigation hierarchy has also been addressed by the Applicant throughout the Examination in various responses, e.g at the Applicant’s Response to the Rule 17 Letter <b>[REP2-029]</b>.</p> <p>Throughout the Examination concerns were raised by the OHAs and Interested Parties regarding potential adverse effects. The Applicant has listened to those concerns and has submitted a set of ‘Without Prejudice LVIA Offer’ plans in Appendix 2 of The Applicant’s response to the Rule 17 Letter REP6-052 in response to ExA’s Points 9 and 10. While not acceding to all of the OHAs’ requests for areas of panel removal, due to their requests not complying with National Policy and making the project unviable, these plans go some way to removing panels from more sensitive areas. These plans also show increased mitigation, particularly along the Evenlode Valley, which shows the introduction of areas of wet woodland.</p>	Not agreed.
5.4.5	<b>[REP6-012]</b> Chapter 8: Landscape and Visual Impact Assessment.	Representative Viewpoints	<p>VWHDC did not agree the viewpoints with the applicant and does not consider that they provide an accurate assessment of the impacts and the subsequent changes to the LVIA during the examination does not address these issues.</p> <p>Host Authorities have outlined their concerns around viewpoints throughout the examination including at <b>[REP2-049]</b>, <b>[REP3-072]</b> (page 17-18 and 37), <b>[REP4-041]</b> (page 6-9), <b>[REP6-117]</b> (page 23).</p> <p>To clarify, correspondence with the applicant in 2022 was about initial viewpoint selection before site visits where completed, there was no objection to the viewpoints chosen by the applicant, but it has been expressed all along that there are additional viewpoint locations that should be covered.</p> <p>VWHDC clearly stated that they had concerns with the range viewpoints at the Scoping stage (note ZTV only contained solar modelling at this stage), and</p>	<p>The candidate representative viewpoints were presented on a ZTV at Scoping. The viewpoints were consulted on with VoWHDC on the 13.10.2022, Subsequent emails to and from Avril Williams up to and including 30.11.2022. Details of alternative / additional viewpoints included in Table 8.5 of LVIA <b>[REP6-012]</b>.</p> <p>Of the 55 Representative Viewpoints, 33 were selected for photomontages <b>[APP-072 to APP-080]</b>. These were agreed with the local planning authorities and are considered appropriate and proportionate to the Project and illustrate the Project at winter Year 1 and summer Year 15, in accordance with the LVIA methodology and best practice guidance <b>[APP-149]</b>. It would have not been appropriate to have illustrated photomontages from all Representative Viewpoints, as there were a number with limited or no views of the Project. However, all viewpoints are included within the assessment of effects in the submitted LVIA <b>[REP6-012]</b>.</p> <p>The Representative Viewpoints, are as they are named – i.e. they are representative of available views along certain routes and within the local landscape. Where these are based on a route a summary for the whole route is included in the description of effects, e.g. for Representative</p>	Not agreed.

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			these concerns were also expressed at PIER stage (still no fully modelled ZTV, solar only) and then again in the DCO application. At no point did the location and number of viewpoints change in this process. The 55 viewpoints presented at Scoping and has stayed at 55 viewpoints at PIER and DCO. VWHDC therefore does not know how the narrative in the EIA Table 8.5 Summary of scoping responses can imply that additional viewpoints were added after Scoping when the number and location of viewpoints were not changed.	<p>Viewpoint 1, an assessment of the effects experienced by people using the whole route during the operational phase is given in paragraph 8.9.144 of Chapter 8: Landscape and Visual Impact Assessment <b>[REP6-012]</b>. It should be considered that the viewpoint assessment (Appendix 8.7 of the LVIA ES Chapter) <b>[REP5-038]</b> deals with static viewpoint locations, a single point taken along a route, whereas PRow's assessment (Appendix 8.6 of the LVIA ES Chapter) <b>[REP5-037]</b> examines the potentially affected users of PRow (visual receptors), illustrated by Viewpoint(s).</p> <p>It is acknowledged that the assessment of the effects on PRow's does not include detailed section by section descriptions of the change in views along each PRow or road. However, the 55 viewpoints provide a good range of evidence of the different effects on the PRow within the study area, at varying geographical locations, distances and elevations, as well as different contexts, to enable professional judgement to be exercised in the assessment of effects along the wider networks.</p> <p>Most of the Representative Viewpoints, which have been agreed with the stakeholders, are located on PRow's. The numbers of people using the public rights of way network within the 5 m study area varies, as does the distance, context and visual characteristics of the view. It is not known how people use different sections of the Public Rights of Way, in which direction and when. Where no firm data are available a relative judgement is sufficient, as proposed in GLVIA3, Therefore, the position has been adopted of individuals using a public rights of way walking towards or through the Project, looking directly at the Project, even if wider views are available. Regarding valency, the position has been taken of that of a person who objects to the presence of the Project. Emphasis was placed on the nature and activity of the visual receptor, such as recreational receptors, e.g., users of PRow's have been cautiously considered to be of high sensitivity.</p> <p>The linear nature of the PRow's determines that views from the route differ, are transient, the visible scale of the Proposed Development varies, all of which will be experienced within a short period of time, even during the operational phase.</p>	
5.4.6	<b>[REP6-012]</b> Chapter 8: Landscape and Visual Impact Assessment.	Local Plan evidence base	<p>The OHAs agreed, at the meeting held on 16<sup>th</sup> October 2025, that the following documents formed part of the evidence base for the West Oxfordshire District Council and the South Oxfordshire and the Vale of the White Horse District Council local plans:</p> <ul style="list-style-type: none"><li>Renewable Energy and Low Carbon Energy Assessment and Strategy for West Oxfordshire (LDA, 2016)</li><li>South Oxfordshire and Vale of White Horse Renewable Energy Study Landscape Sensitivity Assessment (LUC, 2024).</li></ul> <p>VWHDC is not clear how these have informed the LVIA or the applicant's judgements since the LVIA assessment findings have changed little since the DCO application was made, and the studies have not been mentioned prior to revision 4 of the LVIA <b>[REP6-012]</b>.</p>	<p>VoWHDC agreed at the meeting held on 16<sup>th</sup> October 2025, that the following document formed part of the evidence base for the Vale of the White Horse District Council's local plan:</p> <ul style="list-style-type: none"><li>South Oxfordshire and Vale of White Horse Renewable Energy Study Landscape Sensitivity Assessment (LUC, 2024).</li></ul> <p>The Applicant has considered this (LUC) document, as well as the study for WODC (the LDA document) in its choice of areas in which to locate the project, i.e. areas of lower susceptibility to/ higher suitability for, solar farm development.</p>	<p>It is agreed that the VWHDC's study forms part of its evidence base for their forthcoming local plan.</p> <p>It is not agreed the study supports the applicant's choice of area in which to locate the project.</p>
5.4.7		Documents secured by Requirements	The OHAs agree that the documents secured in the requirements are set out in the Project Mitigation Measures and Commitments Schedule <b>[REP4-014]</b> .	The documents secured in the requirements are set out in the Project Mitigation Measures and Commitments Schedule <b>[REP4-014]</b> .	Documents secured in the requirements



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			At the meeting on the 16 <sup>th</sup> of October 2025 the applicant was advised that detailed design documents would need to be substantially in accordance with the outline control documents and the Councils do not agree with the mitigation proposed in the outline control documents, nor the methodology used to assess the adequacy of the mitigation. Several documents are not agreed, as listed at 4.1.2.	<p>Specifically in relation to Requirements 5, 6 and 8 and Schedule 16 of the draft DCO, the Applicant provides the following information:</p> <p>Requirement 5 covers detailed design. The detail design of the development that must be submitted to the relevant planning authority pre-commencement pursuant to Requirement 5 of the DCO must 'accord with the outline layout and design principles'. This ensures that the final design must be within those parameters that are now clearly secured. This gives certainty as the scope of the design parameters within which the final development will be brought.</p> <p>Requirement 6 covers the oLEMP/LEMP. It secures that no part of the authorised development may commence until a written landscape and ecology management plan has been submitted to and approved by the relevant planning authority. This retains control for the relevant planning authority by ensuring that it has a right of approval over the final landscape and ecological mitigation to be given. The requirement secures that the final plan 'must be substantially in accordance with the outline plan' to give certainty to the Applicant that approval will be achieved whilst giving certainty to the relevant planning authority as to the measures that are to be proposed at detailed design.</p> <p>Requirement 8 covers fencing and other means of enclosure. provides that no part of the authorised development may commence until written details of all proposed temporary and permanent fences, walls or other means of enclosure have been submitted to and approved by the relevant planning authority. This ensures that to the extent there is any flexibility in respect of fencing (etc.) which is not captured in the Outline Layout &amp; Design Principles (on the basis that not all design detail is known at this stage), the relevant planning authority retains a right of approval which will apply at the time of discharge of requirements. This ensures that there is the necessary control on that flexibility, secured within the DCO.</p> <p>Schedule 16 of the draft DCO states that to the extent there is a disagreement or uncertainty at detailed design stage, Schedule 16 of the draft DCO sets out the process that will apply in discharging the requirements. This allows the Council to request further information (see paragraph 3 of Schedule 16) to ensure that any approval is appropriately informed, whilst offering the Applicant a route of appeal (see paragraph 4) in the event that approval is denied. This ensures certainty as to the delivery of the Nationally Significant Infrastructure Project in the event that the Council disagrees with the mitigation that effectively the SoS would have considered to be appropriate.</p>	<p>are set out in the Project Mitigation Measures and Commitments Schedule [REP4-014] - Not agreed.</p> <p>The Applicant does not agree at this stage, that several documents remain to be agreed as listed in 4.1.2.</p>

**Table 5.5: Areas of Discussion between the Parties – Noise and Vibration**

Ref	Relevant Application Document	Summary of Description of Matter	Vale of White Horse District Council Current Position	Applicant Current Position	Status
5.5.1	6.3 - ES Chapter 13 - Noise and Vibration [APP-050]	Assessment Findings	The findings of the assessment have been discussed and are broadly agreed with VWHDC.	The findings of the assessment have been discussed and are broadly agreed with VWHDC. This was confirmed and agreed during a virtual meeting on the 16 <sup>th</sup> July 2025.	Broadly agreed.
5.5.2	6.3 - ES Chapter 13 - Noise and Vibration [APP-050]	Operational noise will be limited to a rating level which is up to 4dB greater than the background sound level at the nearest receptor. This operational noise criterion will	Development should be designed to achieve a rating level of 5dB (LAeq) below the typical background (LA90) level at the nearest noise sensitive location. Where this can't be achieved, the various noise control measures considered as part of the assessment should be fully explained (i.e. relocation of	BS 4142:2014+A1:2019 <i>Methods for rating and assessing industrial and commercial sound</i> (BS4142) assessment criteria states that 'A difference of around +5 dB is likely to be an indication of an adverse impact, depending on the context.'	Not agreed.

Ref	Relevant Application Document	Summary of Description of Matter	Vale of White Horse District Council Current Position	Applicant Current Position	Status
		be secured as a requirement of the DCO and agreed with the relevant stakeholders.	noise sources, use of quieter equipment, enclosures, screening, restriction of the hours of operation) and the achievable noise level should be identified.	It is therefore reasonable to state that an adverse effect is avoided where operational phase noise is up to 4dB greater than the background sound level. Paragraph 198 of NPPF states that significant adverse effects should be avoided. Technical guidance and National Policy support the view that an adverse effect is avoided where noise from the development is up to 4dB above the background sound level.	
5.5.3	7.6.1 Botley West Outline Code of Construction Practice (Clean) (Rev 5) - Part 1 [REP6-028] 1.8.2	<p>Core working hours for the construction of the project will be 07:00 – 19:00 hours Monday to Saturday.</p> <p>Up to one hour before and after core working hours for mobilisation (“mobilisation period”).</p>	This is outside the hours we recommend (07:30 – 18:00 Mon-Fri & 08:00 – 13:00 Sat, nothing on Sun or BHs) and should be amended accordingly.	<p>In response to Action Point No. 20 arising at Issue Specific Hearing 2, the Applicant confirmed that a reduction in working hours from 07:00-19:00 to 07:00-13:00 on Saturdays would result in an additional 9.45 weeks added to the Construction Programme [REP6-047]. The revised requested, as set out in REP6-119, for the programme to be 07:30-18:00 on Monday to Friday and 07:30-12:00 on Saturday would result in an additional 27.37 weeks to the Construction programme.</p> <p>The Applicant cannot agree to the revised request as this would have a substantial additional impact on the construction programme and risk efficient delivery of the critical national priority infrastructure. Whilst the scope of the environmental assessment has been carried out on a reasonable worst-case basis (07:00 to 19:00 Monday to Saturday), a substantial increase of 27.37 weeks to the programme may alter the impacts to be expected if the works are to be experienced over a longer duration.</p> <p>Therefore, to ensure certainty of delivery in accordance with the connection agreement and for consistency with the scope of the environmental assessment, the Applicant cannot accept the revised programme of working hours in <b>[REP6-047]</b>.</p>	Not agreed.

**Table 55.6: Areas of Discussion between the Parties – Planning Policy**

Ref	Relevant Application Document	Summary of Description of Matter	Vale of White Horse District Council Current Position	Applicant Current Position	Status
5.6.1	Planning Supporting Statement	<p><b>Application of Planning Policy to Decision Making for NSIP’s</b></p> <p>Section 104 of the Act contains the most pertinent policy outlining the decision-making process for NSIPs and providing guidance on how the Secretary of State (SoS) should approach their decisions. In this respect, Section 104 (3) provides that the SoS must decide applications for development consent in accordance with any National Policy Statement (NPS) except to the extent that the SoS is satisfied that one or more of the following exceptions apply:</p> <ul style="list-style-type: none"> <li>• That deciding the application in accordance with any relevant national policy statement would lead to the United Kingdom being in breach of any of its international obligations;</li> <li>• That deciding the application in accordance with any relevant national policy statement would lead to the Secretary of State being in breach of any duty imposed on the Secretary of State by or under enactment;</li> <li>• That deciding the application in accordance with any relevant national policy statement would be unlawful by virtue of any enactment; and</li> <li>• That the Secretary of State is satisfied that the adverse impact of the proposed development outweighs its benefits.</li> </ul> <p>As such, it is agreed that NPSs make up the relevant primary policy, against which the SoS must make their decision and to the extent that Section 104 allows, national, regional and local policy may also be relevant.</p>	Agreed	Agreed	Agreed.

Ref	Relevant Application Document	Summary of Description of Matter	Vale of White Horse District Council Current Position	Applicant Current Position	Status
5.6.2	Planning Supporting Statement	<p><b>Overview:</b></p> <p>The statutory framework for preparing, examining and determining application for DCOs for NSIPs is provided by the Act. As discussed in section 2, the Act sets out the consenting system for all NSIPs, including those in the energy sector, and provides the legislative context that has guided the below considerations.</p> <p>The relevant NPSs to which the SoS must have regard in accordance with Section 104 (2) and 104 (3) of the Act are considered to be:</p> <ul style="list-style-type: none"> <li>National Policy Statement for Energy (NPS EN-1), National Policy Statement for Renewable Energy Infrastructure (NPS EN-3) and National Planning Statement for Electricity Networks Infrastructure (NPS EN-5).</li> <li>Other policies of relevance identified below include: National Planning Policy Framework NPPF and the Local Development Plan documents for the host authorities West Oxfordshire District Council, Cherwell District Council, the Vale of Horse District Council and Oxford City Council.</li> </ul> <p>Appendix B details local planning policy against which the project will be judged. Described as a 'Compliance Table' it details the applicant's position in respect of degree on compliance with these policy statements well as the host authorities' position with respect to compliance. Together they represent matters agreed and not agreed.</p>	Agreed	Agreed	Agreed.
5.6.3	Planning Supporting Statement	<p><b>Vale of White Horse Local Plan 2031 (Part 1 &amp; Part 2) (adopted)</b></p> <p>The VoWH Local Plan 2031 Part 1 was adopted in December 2016 whilst the Local Plan Part 2 was adopted in October 2019. A Regulation 10A review of the Local Plan 2031 Part 1 was approved in December 2021 and showed that together with Local Plan 2031 Part 2, these documents continue to provide a framework for development that is in overall conformity with government policy.</p> <p>The whole of the Southern Site lies within the administrative area of the VoWH, alongside the southern portion of cable routes. Policies of the Vale of White Horse Local Plan 2031 Part 1 and Local Plan 2031 Part 2 considered of relevance to the project are listed in Appendix B.</p>	Agreed	Agreed	Agreed.
5.6.4	Planning Supporting Statement	<p><b>Vale of White Horse Local Plan (emerging)</b></p> <p>VoWH in conjunction with South Oxfordshire District Council are working on a Joint Local Plan 2041, the latest Local Development Scheme, adopted in September 2023, suggests that the Joint Local Plan 2041 will be adopted in December 2025. Due to the early stage of this plan, it attracts limited weight in the planning process and has not been considered here.</p> <p>Whilst at an early stage and subject to change, and therefore only attracting very limited weight in the planning process, the Joint Local Plan Preferred Options Consultation includes Policy DE5 – Renewable Energy which will encourage proposals for renewable energy schemes and community-led initiatives and set criteria detailing where the schemes and associated infrastructure will be supported. The supporting text for Policy DE5 currently states “We recognise that Solar PV will contribute significantly towards meeting out net zero targets, and therefore the Joint Local Plan will need to support it, alongside a range of other renewable energy opportunities ... The Plan will identify suitable areas for these schemes to ensure they are situated in appropriate locations.” The Preferred Option for Policy DE5 seeks to have a policy that encourages development of renewable energy generation schemes and associated infrastructure; identify broad areas of potential suitability for different types of renewable energy and; includes a set of criteria which all new renewable energy schemes will have to meet. Whilst draft wording of Policy DE5 has been proposed in the Preferred Options document, the areas identified as potentially suitable for ground mounted solar development will be published as the next stage of consultation and are to be defined through further evidence.</p> <p>The Joint Local Plan 2041 is likely to advance through the plan-making process during the DCO application timeframe; therefore, the weight to be given to the Joint Local Plan 2041 may increase in accordance with Paragraph 48 of the NPPF as the review reaches more advance stages.</p>	<p>Agreed that the emerging Local Plan is not expected to be adopted prior to the end of Botley West Examination in mid-November 2025.</p> <p>In relation to Oxfordshire Authorities currently consulting on proposals for a new Unitary Authority/Authorities, no impact is anticipated; if reorganisation takes place (likely to be 2028 at the earliest) existing Plans will still continue until such time as a new Plan is prepared / adopted by any new Authority.</p>	Noted	Agreed.
5.6.5	Planning Supporting Statement	<p><b>Vale of White Horse Neighbourhood Plans (made) – Cumnor</b></p>	Agreed	Agreed	Agreed.

Ref	Relevant Application Document	Summary of Description of Matter	Vale of White Horse District Council Current Position	Applicant Current Position	Status
		The Cumnor Neighbourhood Development Plan was ‘made’ on 18th May 2021 and covers the period 2021 to 2031. The entirety of the Southern Site, lies within the Cumnor Neighbourhood Development Plan Area. The relevant policies from the Cumnor Neighbourhood Development Plan are listed in Appendix B.			
5.6.6	Planning Supporting Statement	<b>Vale of White Horse Neighbourhood Plans (emerging)</b> No emerging neighbourhood plans exist within the proposed development area.	Agreed	Agreed	Agreed.
5.6.7	Planning Supporting Statement	Please see Planning Supporting Statement for list of relevant Development Plan policies and documents, and Appendix B.	Extent of compliance with NPSs suggested to be left to Examining Authority to determine.	Agreed	Agreed.

## Appendix A

### Record of Relevant Correspondence

Date	Form of Correspondence	Topics Discussed	Outcomes
<b>Ecology</b>			
14/03/2023	Meeting	Identified biodiversity and approach to Net Gain methodology as a key topic.	Nil.
3/05/2023	Meeting	Overview of ongoing surveys, designated sites and Biodiversity Net Gain.	Nil.
3/12/2024	Meeting	Protected species licensing.	Letter of no impediment to be sought with Natural England for relevant species.
1/08/2024	Meeting	Set out of project update including methodologies and surveys to date, bats, results and key receptors, emerging impacts, Biodiversity Net gain and timetable.	September meeting to discuss bat radio tracking results.
19/09/2024	Meeting	Set out project update including ongoing design and progress update, Statement of Common Ground, key survey results, Biodiversity Net Gain, ecology strategy and next steps.	Nil
11/07/25	Meeting	Minutes to be agreed by areas covered included: <ul style="list-style-type: none"> <li>Overview of all bat survey work including that from May 2025</li> </ul>	Nil



Date	Form of Correspondence	Topics Discussed	Outcomes
		<p>and activity data analysed to date.</p> <ul style="list-style-type: none"> <li>• Overview of Change Request 2 submitted at D2.</li> <li>• Proposed 25m buffer locations on key bat flightlines plus discussion on location and extent of other buffers.</li> <li>• Provision of bat technical note including contents.</li> <li>• Scope of potential air quality assessment in respect of Oxford Meadows SAC.</li> <li>• Discussion on Local Impact Report Responses.</li> <li>• Discussion on proposed skylark mitigation.</li> <li>• Discussion on nightingale enhancements to OLEMP.</li> </ul> <p>Discussion on monitoring programs and approval process.</p>	
<b>Historic Environment</b>			
July 2023	VoWHDC input into Scoping Opinion	Various	n/a
February 2024	VoWHDC response to PEIR	Various	n/a
February 2025	VoWHDC response to DCO submission	Various	n/a
<b>Agricultural Land Use and PRow</b>			

Date	Form of Correspondence	Topics Discussed	Outcomes
November 2024	Online meeting via Microsoft Team	Meeting with PRow Officer from VWHDC to discuss the proposed management of PRow within the Project site, including temporary and permanent diversions.	Responses received during the meeting were used to inform the assessment reported in ES Chapter 17 - Agricultural Land Use and Public Rights of Way [APP-054] and measures included in the Outline PRow Management Strategy, which forms Annex B of the - Outline Code of Construction Practice - Part 1 [REP6-028].

#### Landscape and Visual Resources

October / November 2022	Correspondences (by email) with all local authorities regarding the selection of Representative Viewpoints.	A detailed log was kept of the responses and any requested for additional/alternative viewpoints. Any changes were incorporated into the PEIR and subsequent ES chapter.	Progressed.
January 2023	Meeting held with OCC (including Landscape Officer) to discuss matters arising on Project, including Landscape	Minutes of meeting issued and actioned where necessary.	Progressed.
June 2023	Submission of Scoping Report, including LVIA section outlining approach to the assessment, including methodology.	Comments received from the Scoping report are detailed within the LVIA [REP6-012] Table 8.5, with details of how they have been addressed.	Progressed.

Date	Form of Correspondence	Topics Discussed	Outcomes
September 2024	Meeting with local authority landscape officers to discuss LVIA specific matters.	Outcome of meeting actioned as part of the PEIR / ES	Progressed.
10 <sup>th</sup> June 2025	Online meeting with local authority landscape officers to discuss LVIA specific matters	Topics of specific discussion were focused around the OHAs Joint Local Impact Report submitted at Deadline 1. With a particular focus on the LVIA methodology and application of significance of effect.	A detailed response to the OHAs Joint LIR (and appended LUC report) would be responded to at Deadline 2. Agreement was reached on the LVIA methodology.
16th October 2025	Online meeting with local authority landscape officers to discuss LVIA specific matters	Topics of specific discussion were focused around the wording of the SoCG(s), issues arising from ISH2 and continued discussions on the LVIA methodology and application of significance of effect.	SoCG(s) have been updated in response to discussions had. Minutes of the meeting completed and issued.
10 <sup>th</sup> November 2025	Email	Topic of email(s) was consultation on Representative Viewpoints.	It was accepted that the Applicant did consult on the Representative Viewpoint locations on the 13.10.2022 and subsequent correspondence between VoWHDC and the Applicant up to and included 30.11.2022.  The viewpoints expressly agreed is disputed. There is no evidence that the VoWHDC

Date	Form of Correspondence	Topics Discussed	Outcomes
			<p>disagreed with viewpoints proposed.</p> <p>VWHDC object to the narrative and how it is phrased.</p> <p>Whilst there is no objection to the viewpoints chosen, VWHDC have expressed all along that there are additional viewpoint locations that should have been covered.</p>
<b>Noise and Vibration</b>			
April 2023	E-mail	Consultation was sought via email to agree upon the proposed baseline sound survey and noise impact assessment methodologies	No response was received
July 2024	E-mail	The proposed noise and vibration assessment methodology was issued to VoWHDC via email.	No response was received
16th Jul 2025	Virtual Meeting	Noise and vibration assessment methodology, baseline methodology & derivation of data, & assessment findings	Agreed and confirmed
<b>Planning Policy</b>			
Ongoing	Email	See Appendix B	See Appendix B

## Appendix B

# VoWH District Council Compliance Tables

### Relevant planning policies of the VoWH Local Plan

Policy	Description	Applicant Comment	Local Authority Comment	Status
<b>Local Plan 2031 Part 1</b>				
Core Policy 1 – Presumption in Favour of Sustainable Development	Planning applications that accord with this Local Plan 2031 (and where relevant, with any subsequent Development Plan Documents or Neighbourhood Plans) will be approved, unless material considerations indicate otherwise. Where there are no policies relevant to the application or relevant policies are out of date at the time of making the decision then the Council will grant planning permission unless material considerations indicate otherwise, and unless: i. any adverse impacts of granting planning permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework taken as a whole, or ii. specific policies in the Framework indicate that development should be restricted.	Solar farms are generally considered to be sustainable forms of development. They produce renewable energy, help cut down harmful GHG emissions, will help generate employment and significantly enhance the landscape and biodiversity of the area. The Project should benefit from the presumption in favour this policy provides.	The proposed development does not accord with the development plan when considered as a whole.	Compliance Not Agreed
Core Policy 7 – Providing Supporting Infrastructure and Services	All new development will be required to provide for the necessary on-site and, where appropriate, off-site	The Project is self-sustaining in terms of on-site infrastructure requirements (it does not rely upon external support), and the Applicant is also willing in	It is agreed the development could comply with this policy.	Compliance Agreed

Policy	Description	Applicant Comment	Local Authority Comment	Status
	<p>infrastructure requirements arising from the proposal. Infrastructure requirements will be delivered directly by the developer and/or through an appropriate financial contribution prior to, or in conjunction with, new development. Where appropriate, developers will be expected to collaborate on the provision of infrastructure which is needed to serve more than one site. In ensuring the timely delivery of infrastructure requirements, development proposals must demonstrate that full regard has been paid to the Infrastructure Delivery Plan and all other relevant policies of this plan.</p>	<p>principle to support maintenance of nearby PRow (funding amount currently in discussion with the OHA's). There is therefore no conflict with this policy.</p>		
Core Policy 13 – The Oxford Green Belt	<p>The Oxford Green Belt will continue to be protected to maintain its openness and permanence. Inappropriate development will not be approved except in very special circumstances. Paragraph 4.2.17 on NPS EN-1 states that the Secretary of State will take as a starting point that the Secretary of State will take as a starting point that CNP Infrastructure will meet the VSC case.</p>	<p>The VSC case which supports the project being allowed in this location for a temporary period is set out in this PSS. On balance the Project is supported by a VSC case that outweighs harm to the Green Belt and any other harm. Paragraph 4.2.17 on NPS EN-1 states that the Secretary of State will take as a starting point that CNP Infrastructure will meet the VSC case.</p>	<p>VWHDC consider that the harm caused by inappropriate development in the Green Belt, and the loss of openness will be significant, and the harm is not outweighed by VSC or other considerations, particularly as the benefits of the proposed development can be realised on land elsewhere outside of the Oxford Green Belt. The proposed development is contrary to Core Policy 13.</p>	Compliance Not Agreed

Policy	Description	Applicant Comment	Local Authority Comment	Status
Core Policy 33 – Promoting Sustainable Transport and Accessibility	The Council will work with OCC and others to, <i>inter alia</i> , actively seek to ensure that the impacts of new development on the strategic and local road network are minimised.	Chapter 12 <b>[REP5-016]</b> assess the effect of the Project on the highway network. No adverse effects are predicted.  The Project complies with Core Policy 33.	The proposed development complies with Core Policy 33.	Compliance Agreed
Core Policy 35 – Promoting Public Transport, Cycling and Walking	The Council will work with OCC and others to, <i>inter alia</i> , seek to support the provision of new cycling routes where proposals are consistent with other plan policies.	The Project provides a new cycle route south of Bladon.  The Project complies with Core Policy 35.	The proposed development complies with Core Policy 35.	Compliance Agreed
Core Policy 37 – Design and Local Distinctiveness	Seeks to ensure all development achieves high quality design standards.	The Applicant has produced an updated Outline Layout and Design Principles document <b>[REP6-038]</b> providing more detail on the design parameters and how that is secured. The Applicant has also submitted an updated Project Mitigation Measures and Commitments Schedule <b>[REP4-014]</b> , and a consolidation of the Applicant Approach to Design Note which also deals with the latest Government design guidance issued in April 2025 – Annex 4 of <b>[APP-215]</b> . The Applicant considers that its Project substantially accords with this policy.	It is agreed the development could comply with this policy through the application of the outline layout and design principles document.	Compliance Agreed
Core Policy 39 – The Historic Environment	The Council will collaborate with others to ensure new development conserves and where possible enhances designated and non-designated heritage assets, and their setting, in accordance with national legislation and guidance.	The assessment of the likely impacts and effects on heritage assets is set out in Chapter 7 of the ES. No significant effects are predicted.  In Planning terms there is no substantial harm arising and therefore the Project is substantially in accordance with Core Policy 39.	VWHDC remains of the view that the loss of the rural, agricultural character which forms part of the setting of designated heritage assets and contributes to the understanding and experience of those assets is not outweighed by the benefits of the proposed development. The	Compliance Not Agreed

Policy	Description	Applicant Comment	Local Authority Comment	Status
			proposed development is contrary to Core Policy 39.	
Core Policy 40 - Sustainable Design and Construction	New development is required to incorporate climate change adaptation measures to ensure resilience to climate change.	The Applicant agrees with the LPA; the Project complies with Core Policy 40.	The proposed development could comply with Core Policy 40.	Compliance Agreed
Core Policy 41 – Renewable Energy	The Council encourages schemes for renewable and low carbon energy generation. Planning applications for renewable and low carbon energy generation (excluding wind energy) will be supported, provided that they do not cause significant adverse effects.	Whilst some limited adverse effects will arise, the benefits of the Project are considered to clearly outweigh these and thus it complies with Core Policy 41. The Project represents a unique opportunity to secure critical national infrastructure in the form of renewable solar energy. It is also able to contribute at scale to the resolution of the Climate Change Emergency declared by the authority.	The proposed development is contrary to Core policy CP41 as it has a significant adverse effect to the landscape.	Compliance Not Agreed
Core Policy 42 – Flood Risk	The risk and impact of flooding will be minimised by sensitively locating developments, managing flood risk and by not increasing the risk of flooding elsewhere.	Flood risk is addressed within Chapter 10 of the ES <b>[REP6-010]</b> . A flood Risk assessment has been undertaken amongst other assessments. No adverse effects are predicted during construction, operation or the decommissioning phases of the Project.  The Project complies with Core Policy 42.	The proposed development complies with Core Policy 42.	Compliance Agreed
Core Policy 43 – Natural Resources	Developers are encouraged to make provision for the effective use of natural resources where applicable, including but not limited to avoiding the development of the best and most versatile agricultural land, unless it is demonstrated to be the most sustainable choice from reasonable	Chapter 18 in the ES <b>[APP-055]</b> assesses waste and natural resources. Waste minimisation measures will be adopted as part of the oCoCP, oOMP and Decommissioning Plan.  In terms of BMV, the Project will lead to a small loss of BMV land (refer to Chapter 17 in the ES – a permanent loss of approx. 5.5ha). Approximately 3.8ha of that loss relates to the positioning of the NGET substation. This is sited to be close to the	The proposed development is contrary to Core Policy 43, which seeks to avoid developing the best and most versatile agricultural land preferring use of areas of poorer quality land in preference to that of higher quality.	Compliance Not Agreed



Policy	Description	Applicant Comment	Local Authority Comment	Status
	alternatives, by first using areas of poorer quality land in preference to that or a higher quality.	adjacent 400kV lines and adjacent to the Applicant main substation. No better alternative siting could be established by the Applicant within the DCO Order Limits.  The overall loss of BMV land is not considered to be significant in EIA terms or policy terms. The Project is substantially in accordance with Core Policy 43.		
Core Policy 44 – Landscape	The key features that contribute to the nature and quality of the VoWH District's landscape will be protected from harmful development and where possible enhanced.	Chapter 8 of the ES considers effects upon the landscape.  The Project will affect landscape character as it introduces a form of development that is not currently common in the landscape. Limited adverse effects cannot be avoided, but these effects have been minimised by following key layout and design principles. The Layout and Design Principles document <b>[REP6-038]</b> provides for buffers between existing settlements and the solar arrays, buffers to protect trees hedgerows and woodland. These measures together with the significant new landscaping proposed, assist in reducing adverse visual effects and effect upon landscape character.  One decommissioned, the project will leave an important and significant landscape legacy, resulting in a significant enhancement of the area (see Landscape, Ecology and Amenities Areas plan <b>[CR2-043]</b>  On balance the Project is considered to comply with Core Policy 44.	The development is contrary to Core Policy 44, which seeks to protect the landscape including important views and tranquillity. VWHDC considers it is not possible to locate solar development in this landscape without significant adverse effects on the landscape character and views.	Compliance Not Agreed
Core Policy 45 – Green Infrastructure	A net gain in Green Infrastructure, including biodiversity, will be sought wither through on-site	Chapter 8 and 9 deal with landscape and ecology issues respectively.	The proposed development complies with Core Policy 45.	Compliance Agreed

Policy	Description	Applicant Comment	Local Authority Comment	Status
	provision or off-site contributions, and the targeted use of other funding sources. A net loss of Green Infrastructure, including biodiversity, through development proposals, will be resisted.	<p>The Project presents a unique opportunity for the planning authority to secure significant BNG and landscape enhancements. This will be achieved by retaining an agricultural use beneath the solar arrays and on other undeveloped land, and by managing it in a way to deliver significant BNG. Significant new landscaping proposals also form part of the Project. Details are set out within the oLEMP [REP6-034] and BNG Report in Volume 3, Appendix 9.13 [REP6-019] and the Landscape, Ecology and Amenities Plan [CR2-043].</p> <p>The Project complies with Core Policy 45.</p>		
Core Policy 46 – Conservation and Improvement of Biodiversity	Development that will conserve, restore and enhance biodiversity will be permitted. Opportunities for biodiversity gain, including the connection of sites, large-scale habitat restoration, enhancement and habitat re-creation will be actively sought, with a primary focus on delivery in the Conservation Target Areas. A net loss of biodiversity will be avoided.	<p>The Project presents a unique opportunity for the planning authority to secure significant BNG. This will be achieved by retaining an agricultural use beneath the solar arrays and on other undeveloped land, and by managing the land in a way to deliver significant BNG. Details are set out within the oLEMP [REP6-034] and BNG Report –n\volume 3, Appendix 9.13 [REP6-019]</p> <p>The Project complies with Core Policy 46.</p>	The proposed development could comply with Core Policy 46, but further work is required to address biodiversity impacts	Compliance Not Agreed
<b>Local Plan 2031 Part 2</b>				
Core Policy 13a – Oxford Green Belt	The Green Belt Boundary is amended however the approach to development within the Oxford Green Belt is set out in Core Policy 13 (Local Plan 2031: Part 1)	The VSC case which supports the project being allowed in this location for a temporary period is set out in the PSS (REP1-012). On balance the Project is supported by a VSC case that outweighs harm to the Green Belt and any other harm.	VWHDC consider that the harm caused by reason of inappropriate development in the Green Belt, and the loss of openness will be significant, and the harm is not outweighed by VSC or	Compliance Not Agreed

Policy	Description	Applicant Comment	Local Authority Comment	Status
		Paragraph 4.2.17 on NPS EN-1 states that the Secretary of State will take as a starting point that CNP Infrastructure will meet the VSC case.	other considerations, particularly as the benefits of the proposed development can be realised on land elsewhere outside of the Oxford Green Belt.	
Development Policy 16 – Access	<p>All proposals for new development will be required to be of high quality design in accordance with Core Policy 37: Design and Local Distinctiveness. In addition to those criteria set out in Core Policy 37 and other relevant Local Plan policies, proposals for development will also need to provide evidence to demonstrate that:</p> <p>i. adequate provision will be made for loading, unloading, circulation, servicing and vehicle turning, and</p> <p>ii. acceptable off-site improvements to the highway infrastructure (including traffic management measures), cycleways, public rights of way and the public transport network can be secured where these are not adequate to service the development.</p>	<p>Traffic management measures for construction vehicles to allow for efficient deliveries and access are set out in the oCTMP secured as part of the CoCP (<b>REP6-028</b>) requirement within the draft DCO. All construction accesses are existing gated field accesses which have been designed to accommodate the movement of HGVs as set out within Appendix 12.8: Accesses and highway drawings [<b>APP-206 to 209</b>] and Site Construction Compound Accesses [<b>APP-226</b>].</p>	The proposed development can comply with Development Policy 16.	Compliance Agreed
Development Policy 17 – Transport Assessments and Travel Plans	Proposals for a major development will need to be supported by a Transport Assessment or Statement and	Chapter 12 of the ES [ <b>REP5-016</b> ] contains an integrated TA throughout to consider the potential impacts and effects on the operation of the highway network arising	The proposed development complies with Development Policy 17.	Compliance Agreed

Policy	Description	Applicant Comment	Local Authority Comment	Status
	Travel Plan in accordance with Oxfordshire County Council guidance, including their Walking and Cycling Design Standards, and the latest National Planning Practice Guidance. The scope of the assessment should be agreed with the County Council as the highway authority, in association with the district council, as the planning authority. Highways England should also be consulted as appropriate, in accordance with Highways England guidance.	from the Project. Travel plan measures have been included within an oCTMP secured as part of the Code of Construction Practice (CoCP) <b>[REP6-028 REP6 028 and 030]</b> requirement within the draft DCO. National Highways and Oxfordshire County Council (OCC) as the relevant highway authorities have been consulted on the potential impacts and mitigation relevant to the SRN and the LRN as set out in Section 12.3 of this chapter.		
Development Policy 21 – External Lighting	Sets out measures to ensure development involving external lighting is appropriately designed and located.	A lighting scheme will be prepared to support security measures for key infrastructure. The scheme will be delivered through the oOMP <b>[REP6-032]</b> and via a Requirement within the DCO.	The proposed development can comply with Development Policy 21 on this basis.	Compliance Agreed
Development Policy 23 – Impact of Development on Amenity	Proposals should demonstrate they will not result in significant adverse impacts on the amenity of neighbouring uses, individually and when considered cumulatively.	Chapter 5 of the ES, Alternatives, describes the design evolution of the Project and how from the outset, measures were introduced to avoid or minimise potential for significant adverse effects upon amenity (see Layout and Design Principles document <b>[REP6-038]</b> , Mitigation Measures and Commitments Schedule, Volume 3, Appendix 6.1 <b>[REP4-014]</b> and the oCoCP <b>[EN010147/APP/7.6.1]</b> . The Project complies with development Policy 23.	The proposed development is contrary to Development Policy 23.	Compliance Not agreed
Development Policy 25 –	Seeks to ensure new development is	Chapter 13 in the ES, Noise, deals with potential effects arising from noise. No	The proposed development complies	Compliance Agreed

Policy	Description	Applicant Comment	Local Authority Comment	Status
Noise Pollution	acceptable in relation to noise pollution.	significant effects are predicted. The Project complies with Development Policy 25.	with Development Policy 25.	
Development Policy 26 – Air Quality	Seeks to ensure new development is adequately considers air quality.	Chapter 19 in the ES, Air Quality, deals with effects relating to air quality. No significant effects are predicted. The Project complies with Development Plan Policy 26.	The proposed development complies with Development Policy 26.	Compliance Agreed
Development Policy 27 – Watercourses	Seeks to ensure watercourses are accommodated appropriately within new development.	Chapter 10, Hydrology and Flood Risk, reports on potential impacts upon watercourses.	The proposed development complies with Development Policy 27.	Compliance Agreed
Development Policy 28 – Waste Collection and Recycling	All development proposals will be expected to be consistent with the Council's Waste Planning Guidance. For development proposals, the Council will consider favourably the use of sustainable waste management initiatives, where they are likely to provide environmental and financial benefits	To the extent this policy applies, waste and resources is addressed in Chapter 18 of the ES <b>[APP-055]</b> , as well as in the Outline Code of Construction Practice <b>[REP6-028 &amp; REP6-030]</b> , and in the Decommissioning Plan <b>[REP6-036]</b> .	The proposed development can comply with Policy 28.	Compliance Agreed
Development Policy 31 – Protection of Public Rights of Way, National Trails and Open Access Areas	Seeks to support improvements to the Public Rights of Way Network and Open Access Areas, and to protect National Trails.	Chapter 17, Agriculture Land Use and Public Rights of Way describes the Projects proposals in respect of Public Rights of Way and access. Chapter 16 on Human Health also reports on access issues <b>[CR2-023]</b> . New permissive paths are proposed alongside improvements to existing rights of way (see Landscape, Ecology and Amenities Area Plan <b>[EN010147/APP/7.3.3]</b> ). The Project complies with Development Policy 31.	The development is contrary to Development Policy 31. VWHDC considers it is not possible to locate solar development in this landscape without significant adverse effects on the landscape character and views experienced from Public Rights of Way.	Compliance Not Agreed

Policy	Description	Applicant Comment	Local Authority Comment	Status
Development Policy 36 – Heritage Assets	New development that may affect designated and non-designated heritage assets is required to demonstrate that it conserves and enhances the special interest or significance of the heritage assets and its setting in accordance with Core Policy 39. Harm to or loss of the significance of a designated heritage asset will require clear and convincing justification.	The assessment of the likely impacts and effects on heritage assets is set out in Chapter 10 of the ES. No significant adverse effects are predicted.  In planning policy terms, the project complies with Development Policy 36.	VWHDC remains of the view that the loss of the rural, agricultural character which forms part of the setting of designated heritage assets and contributes to the understanding and experience of those assets is not outweighed by the benefits of the proposed development. The proposed development is contrary to Development Policy 36.	Compliance Not Agreed
Development Policy 37 – Conservation Areas	Requires development within or affecting the setting of a Conservation Area to demonstrate that it will conserve or enhance its special interest, character, setting and appearance.	The assessment of the likely impacts and effects on heritage assets is set out in Chapter 10 of the ES. No significant adverse effects are predicted.  In planning policy terms, the project complies with Development Policy 37.	It is agreed the proposed development would not have an adverse impact affecting the Setting of Cumnor Village Conservation Area and therefore complies with Development Policy 37.	Compliance Agreed
Development Policy 38 – Listed Buildings	Proposals for additions or alterations to, or the demolition of, a Listed Building (including partial demolition), and/or for development within the curtilage, and/or within the setting of, a Listed Building must demonstrate that they will preserve or enhance its special architectural or historic interest and significance.	The Applicant has applied appropriate measures in consultation with the County archaeologist and NE to assess setting. It is in substantial accordance with this policy.	VWHDC remains of the view that the loss of the rural, agricultural character which forms part of the setting of designated heritage assets and contributes to the understanding and experience of those assets is not outweighed by the benefits of the proposed development. The proposed development is contrary to Development Policy 38.	Compliance Not Agreed
Development Policy 39 – Archaeology	Seeks for development to not have a detrimental impact on the site of	The assessment of the likely impacts and effects on heritage assets is set out in Chapter 10 of the ES. No	The proposed development can comply with	Compliance Agreed



Policy	Description	Applicant Comment	Local Authority Comment	Status
and Scheduled Monuments	or setting of nationally important designated or non-designated archaeological remains or Scheduled Monuments.	significant adverse effects are predicted.  In planning policy terms, the project complies with Development Policy 39.	Development Policy 39.	

### Cumnor Neighbourhood Development Plan relevant policies

Policy	Description	Comment	Local Authority Comment	Status
Policy DBC2 – Cumnor Conservation Area	Development proposals within the Conservation Area and its setting should preserve or enhance its significance as a designated heritage asset.	The assessment of the likely impacts and effects on heritage assets is set out in Chapter 10 of the ES. No significant adverse effects are predicted.  In planning policy terms, the project complies with Policy DBC2.	It is agreed the proposed development would not have an adverse impact affecting the Setting of Cumnor Village Conservation Area and therefore complies with Policy DBC2.	Compliance Agreed
Policy DBC4 – Development in the Green Belt	The Green Belt will continue to be protected to maintain its openness and permeance; development in the Green Belt will be determined against VOWH Local Plan Part 1 Core Policy 13. Inappropriate development will not be supported except in very special circumstances.	The VSC case which supports the project being allowed in this location for a temporary period is set out in the PSS (REP1-012). On balance the Project is supported by a VSC case that outweighs harm to the Green Belt and any other harm.  Paragraph 4.2.17 on NPS EN-1 states that the Secretary of State will take as a starting point that CNP Infrastructure will meet the VSC case.	VWHDC consider that the harm caused by reason of inappropriate development in the Green Belt, and the loss of openness will be significant, and the harm is not outweighed by VSC or other considerations, particularly as the benefits of the proposed development can be realised on land elsewhere outside of the Oxford Green Belt. The proposed development is contrary to Policy DBC4.	Compliance Not Agreed
Policy DBC6 – Conserving and Enhancing Local Heritage Assets	The Neighbourhood Plan has identified Local Heritage Assets and the effect which development would have on the significance of these assets should be taken into account in	The assessment of the likely impacts and effects on heritage assets is set out in Chapter 10 of the ES. No significant adverse effects are predicted.	The proposed development complies with Policy DBC6.	Compliance Agreed

Policy	Description	Comment	Local Authority Comment	Status
	planning applications.	In planning policy terms, the project complies with Policy DBC6.		
Policy DBC7 – Important Views	<p>The Neighbourhood Plan identifies Important Views as contributing to the essential rural character of the Parish. Developments should preserve, or where practicable enhance, the local character of the landscape and should take account of the important views identified.</p> <p>Development which would have an unacceptable impact on the local character of the landscape and/or on an identified important view will not be supported.</p>	<p>Chapter 8 of the ES considers effects upon the landscape. <b>[REP6-012]</b></p> <p>The Project will affect landscape character as it introduces a form of development that is not currently common in the landscape. Limited adverse effects cannot be avoided, but these effects have been minimised by following key layout and design principles. The Layout and Design Principles document <b>[REP6-038]</b> provides for buffers between existing settlements and the solar arrays, buffers to protect trees hedgerows and woodland. These measures together with the significant new landscaping proposed, assist in reducing adverse visual effects and effect upon landscape character.</p> <p>One decommissioned, the project will leave an important and significant landscape legacy, resulting in a significant enhancement of the area (see Landscape, Ecology and Amenities Areas plan <b>[CR2-043]</b>)</p>	The proposed development is contrary to Policy DBC7, which seeks to protect important views and tranquillity. VWHDC considers it is not possible to locate solar development in this landscape without significant adverse effects on the landscape character and views.	Compliance Not Agreed
Policy RNE1 – Green Infrastructure	Proposals should protect, and where practicable enhance, valued landscapes, sites of biodiversity or geological value and soils in a manner commensurate with their statutory status or identified quality in the development plan, and minimise impacts on, and providing net gains for, biodiversity where practicable. Particular account should be taken of:	<p>Chapter 8 and 9 deal with landscape and ecology issues respectively.</p> <p>The Project presents a unique opportunity for the planning authority to secure significant BNG and landscape enhancements. This will be achieved by retaining an agricultural use beneath the solar arrays and on other undeveloped land, but managing it in a way to deliver significant BNG. Significant new landscaping proposals also form part of the Project,</p>	The proposed development can comply with Policy RNE1.	Compliance Agreed

Policy	Description	Comment	Local Authority Comment	Status
	<ul style="list-style-type: none"> <li>Local footpaths</li> <li>Trees and Hedgerows</li> <li>The Hurst on Cumnor Hill, Spring Farm and Wytham Woods SSSIs.</li> <li>Designated Ancient Woodlands, Priority Habitats and Priority Species</li> <li>Chawley, Smith Hill Copse, Long Leys Farm Meadows, Long Copse, Footpath at Chawley, Thanks Island west of Farmoor, Farmoor Reservoir and Swinford Meadow LWSs.</li> <li>Common land and village greens.</li> </ul> <p>Proposals should maintain and enhance existing on-site biodiversity assets and provide for wildlife needs on site where practicable. On-site biodiversity enhancements will be supported as will proposals that provide wildlife corridors allowing wildlife to move from one area of habitat to another.</p>	<p>building upon the existing landscape structure of the area.</p> <p>Details are included within the oLEMP <b>[EN010147/APP/7.6.3]</b> and BNG Report – Volume 3, Appendix 9.13 <b>[REP6-020]</b>, and the Landscape, Ecology and Amenities Area plan <b>[CR2-043]</b>.</p> <p>The Project complies with Policy RNE1.</p>		
Policy RNE2 – Flood Risk	Development proposals should be located and designed to take account of flood risk, with particular attention give to potential flood risk impacts in Farmoor (as shown on maps 14 and 15), Cumnor Hill (as	Flood risk is addressed within Chapter 10 of the ES (ref Table 10.3). <b>[REP6-010]</b> A flood Risk assessment has been undertaken amongst other assessments. No adverse effects are predicted during construction, operation or the decommissioning phases of the Project.	The proposed development can comply with Policy RNE2.	Compliance Agreed

Policy	Description	Comment	Local Authority Comment	Status
	<p>shown on map 15) and Dean Court area (as shown on map 15).</p> <p>Unless the exception tests in paragraph 159 of the NPPF are met, inappropriate developments in areas at risk of flooding will not be supported. If development in such areas is required, the development should be made safe for its lifetime without increasing flood risk elsewhere.</p> <p>There should be no unacceptable increase in surface water discharge off site with proposals taking account of impacts in terms of run off generations and surface water drainage.</p>	It is considered that the Project complies with Policy RNE2.		
Policy T11 – Sustainable Transport	<p>“A. As appropriate to its scale, nature and location new development should incorporate a balanced and sustainable transport provisions, including;</p> <ul style="list-style-type: none"> <li>• Facilities for cycling;</li> <li>• Off street parking provision;</li> <li>• Convenient pedestrian links to public transport facilities;</li> <li>• Electric charging points for vehicles.</li> </ul> <p>B. New development should not have an unacceptable impact on the free and safe flow of traffic in general, and at the</p>	<p>Chapter 12 in the ES, considers relevant traffic and transport proposals and environmental effects. <b>Section 12.9</b> of this chapter assesses the impact of construction vehicle movements arising from the Project on the LRN and SRN.</p> <p>No significant adverse effects are predicted. <b>[REP5-016]</b></p> <p>The Project protects existing and provides new pedestrian links and a new cycle link (see Landscape, Ecology and Amenities Plan ref <b>[CR2-043]</b>).</p> <p>The Project complies with Policy T11.</p>	The proposed development complies with Policy T11.	Compliance Agreed

Policy	Description	Comment	Local Authority Comment	Status
	<p>following locations in particular:</p> <p>i. Land adjacent to or near to the A420 approaching Botley Interchange;</p> <p>ii. Lower Cumnor Hill and Eynsham Road;</p> <p>iii. The historic village core of Cumnor;</p> <p>iv. Swinford Toll Bridge.”</p>			
Policy T12 – Cycle Routes	<p>The B4044 cycle route as shown on map 19 is safeguarded. New development adjacent to this should enhance the safety and amenity of the proposed cycle path and development proposal should not compromise the scope for public access to the protected route. Development proposals that maximise opportunities for cycle movements to promote connectivity within and between the settlements will be supported.</p>	<p>Chapter 17, Agriculture, Land Use and Public Rights of Way assess effects upon rights of way. <b>[APP-054]</b></p> <p>It describes the temporary diversions necessary during construction and proposed permanent diversions. New permissive paths and a cycleway is proposed.</p> <p>No significant adverse effects are predicted.</p> <p>The Project accords with Policy T13.</p>	<p>The proposed development complies with Policy T12.</p>	<p>Compliance Agreed</p>
Policy T13 – Footpaths and Bridleways	<p>“A. New development proposals should take into account the safety, accessibility and visual amenity of Cumnor’s network of footpaths and bridleways. Developments proposals which would have an unacceptable impact on their accessibility and recreational amenity value will not be supported.</p> <p>B. Where it is practicable to do so new development</p>	<p>Chapter 17, Agriculture, Land Use and Public Rights of Way assess effects upon footpaths and bridleways.</p> <p>It describes the temporary diversions necessary during construction and proposed permanent diversions. The permanent diversions are limited in length and realign the statutory route to the existing ‘desire line’ of the right of way actually used by the public.</p> <p>Existing footpaths are protected, and new permissive paths and cycleway is proposed.</p>	<p>The proposed development is contrary to Policy T13. VWHDC considers it is not possible to locate solar development in this landscape without significant adverse effects on the landscape character and views experienced from Public Rights of Way.</p>	<p>Compliance Not Agreed</p>

Policy	Description	Comment	Local Authority Comment	Status
	should take opportunities to enhance the accessibility, connectivity and amenity of footpaths and public rights of way."	No significant adverse effects are predicted. The Project accords with Policy T13.		